

1 Friday, 21 April 2017  
 2 (10.30 am)  
 3 THE CHAIRMAN: Yes, Mr Beer.  
 4 MR BEER: Thank you, sir.  
 5 Brian Davies, please.  
 6 MR BRIAN DAVIES (sworn)  
 7 THE CHAIRMAN: Good morning, Mr Davies. If you would like  
 8 to sit down, please feel free to do so.  
 9 Questions from MR BEER  
 10 MR BEER: Mr Davies, my name is Jason Beer and I ask  
 11 questions on behalf of the Inquiry. In front of you  
 12 there should be a bundle V, witness statements.  
 13 If you open it at page 29, that is tab 9 for those  
 14 of us who have it tabbed, and look between pages 29 and  
 15 38, there should be a witness statement in your name  
 16 dated 29 December 2016.  
 17 **A. Yes, sir.**  
 18 Q. Are the contents of that witness statement true to the  
 19 best of your knowledge and belief?  
 20 **A. They are, sir, yes.**  
 21 Q. By way of background, can you help us: when did you join  
 22 the police service?  
 23 **A. 1988.**  
 24 Q. So you have 29 years police service. Is that right?  
 25 **A. Correct.**

Page 1

1 Q. I think you are currently holding the rank of chief  
 2 inspector, is that right?  
 3 **A. I am.**  
 4 Q. A chief inspector of GMP but posted with the College of  
 5 Policing as a police service manager. Is that right?  
 6 **A. A police standards manager, so I am seconded there, yes.**  
 7 Q. Is that secondment concerned with specialist operations?  
 8 **A. It is.**  
 9 Q. Does that mean that you are responsible on a national  
 10 basis for the guidance and curriculum for the use of  
 11 firearms, less lethal weapons and public order?  
 12 **A. That's correct, sir, yes.**  
 13 Q. Relevantly, so far as this case is concerned, I think  
 14 you were the head of department in the TFU in GMP  
 15 between 2016 and 2010?  
 16 **A. From around July 2006 I think it was, until some point**  
 17 **in 2010.**  
 18 Q. What were your responsibilities as the head of TFU?  
 19 **A. I was the operational chief inspector, so I was**  
 20 **responsible for managing the operational threat and**  
 21 **risk, armed criminality, to protect the people of**  
 22 **Greater Manchester.**  
 23 **That roughly involved maintaining and providing 24/7**  
 24 **armed response policing cover across the Greater**  
 25 **Manchester for spontaneous and preplanned firearms**

Page 2

1 **operations. There was wider responsibilities around**  
 2 **counter terrorism and national mobilisation commitments.**  
 3 **There was also administrative functions regarding**  
 4 **management of finance and budgets, staff developments,**  
 5 **recruitment into the unit, management performance of**  
 6 **teams and individuals, and maintaining standards of**  
 7 **professional practice.**  
 8 Q. Thank you. Did you have any responsibility for the  
 9 research and development of weapons?  
 10 **A. Not personally, sir, no, but I was aware that one of the**  
 11 **inspectors had that responsibility.**  
 12 Q. Was that inspector Andrew Holmes?  
 13 **A. It was.**  
 14 Q. Who had given him that responsibility?  
 15 **A. Well, I think that was given to him before I arrived.**  
 16 **Because what tended to happen in the TFU was -- I was**  
 17 **supported, I think, by 6 inspectors who all had devolved**  
 18 **responsibility. So somebody would be in charge of**  
 19 **recruitment, somebody would be in charge of the armour**  
 20 **procedures, somebody in charge of vehicles.**  
 21 **Inspector Holmes was in charge of the operations team.**  
 22 **So he was in charge of, I think, standard operating**  
 23 **procedures, tactics, developments and research, I think,**  
 24 **of equipments, and some others as well.**  
 25 Q. So he had a standing responsibility for that at the time

Page 3

1 that you arrived?  
 2 **A. Yes, it seemed to go by the post that people were in,**  
 3 **rather than the individual.**  
 4 Q. To what extent were you required to supervise him?  
 5 **A. Well, I would supervise him on a daily basis, so I would**  
 6 **have an understanding of what his role and**  
 7 **responsibilities were, his management of the operations**  
 8 **teams, as with other inspectors as well.**  
 9 Q. Speaking at a high level of generality to begin with,  
 10 what personal involvement, other than presenting the  
 11 briefing paper at the FUG on 12 June 2007, did you have  
 12 in the approval process of the CSDC canister in GMP?  
 13 **A. Well, I was aware that the research and evaluation was**  
 14 **taking place, and I think I can recall some**  
 15 **demonstrations back in the Openshaw complex, of the**  
 16 **actual device. So I was aware, at that point, that it**  
 17 **was taking place but I didn't know what the outcome was**  
 18 **going to be.**  
 19 Q. Now, the CSDC was introduced during your time as head of  
 20 TFU. Is that right?  
 21 **A. Yes, it was.**  
 22 Q. Other than an awareness of these demonstrations, and  
 23 awareness, I think, of the fact that Inspector Holmes  
 24 was conducting some research and then presenting the  
 25 paper on 12 June, did you have any other role?

Page 4

1 **A. Not that I can recall. I mean, I can understand why it**  
 2 **was being brought in in relation to a safer option,**  
 3 **because there was concern about firing RIP rounds into**  
 4 **vehicles, particularly on vehicle strike operations.**  
 5 Q. If you just look at paragraph 3 of your witness  
 6 statement, please, about halfway through you say:  
 7 "The process of bringing the CSDC from initial idea  
 8 to an operationally usable device was overseen by  
 9 Inspector Holmes, the inspector in charge of the  
 10 specialist operations team."  
 11 **A. Yes.**  
 12 Q. "Inspector Holmes [who the chairman heard from yesterday  
 13 morning] was an excellent officer and someone who I was  
 14 and am confident I could depend on to do a job to the  
 15 very high standards I would expect of my staff. If  
 16 I gave Inspector Holmes a task, I would be sure it would  
 17 be completed in a very thorough manner."  
 18 Is that right?  
 19 **A. Yes.**  
 20 Q. Did that view of him affect the nature of the  
 21 supervision over the task that you put in place?  
 22 **A. Yes, yes, it did. My particular leadership style would**  
 23 **obviously -- I have taught a number of leadership styles**  
 24 **in my service but the one I would still subscribe to was**  
 25 **the situational leadership, whereby I would use the**

Page 5

1 **developments or a style relating to the developments of**  
 2 **the individual. And Inspector Holmes was a very**  
 3 **competent inspector, in my view. Very experienced in**  
 4 **firearms, and of all the inspectors I'd got, he**  
 5 **effectively got the top job as the ops team inspector in**  
 6 **the TFU, and it is quite clear that he wanted to develop**  
 7 **further, so it was no surprise that when he moved on**  
 8 **from firearms he became a temporary chief inspector in**  
 9 **specialist operations. So I felt I didn't need to be**  
 10 **directional to him but more supportive in terms of some**  
 11 **of the work he did.**  
 12 Q. We have obviously heard in great detail yesterday  
 13 exactly what he did and didn't do, but were you  
 14 therefore not completely sighted on what he was doing  
 15 and not doing in relation to this project?  
 16 **A. I was not fully sighted, no.**  
 17 Q. Were you at this time, 2007, familiar with the code of  
 18 practice on the Police Use of Firearms and Less Lethal  
 19 Weapons?  
 20 **A. I would say I had a reasonable knowledge of it, sir.**  
 21 **But it was not -- it wouldn't be something that I would**  
 22 **have cause to refer to on a regular basis.**  
 23 Q. I suspect now you are very familiar with it in your  
 24 current role because I think the college is undertaking  
 25 a review. Is that right?

Page 6

1 **A. I am indeed, sir, yes, and my knowledge is far superior**  
 2 **than what it was in 2007.**  
 3 Q. There may be a problem of dividing the knowledge that  
 4 you now have, as to what the code says and what it  
 5 means, with what your position was in 2007. Would that  
 6 be fair?  
 7 **A. I would agree, sir, yes.**  
 8 Q. You are undertaking, at the moment, a national task of  
 9 reviewing the code of practice.  
 10 **A. Yes, I mean, the code started to be reviewed in 2009 by**  
 11 **the Home Office. And it went to a consultation, and**  
 12 **then thereafter it stalled and I am not sure what the**  
 13 **reason was. But when --**  
 14 Q. I think you have kindly produced, and I think you  
 15 produced this to the Inquiry in your current capacity,  
 16 a draft paper from Mr Arundale?  
 17 **A. Yes, I was given those documents from the armed policing**  
 18 **secretariat because, obviously, the Home Office -- so**  
 19 **once a college was established as the writer of codes,**  
 20 **the Home Office commissioned the college to rewrite the**  
 21 **codes of practice for the Police Use of Firearms. So**  
 22 **one of the things that I did was obviously seek out some**  
 23 **of the background work that had been done previously so**  
 24 **we could compare it and contrast it with what needed to**  
 25 **be done now.**

Page 7

1 Q. Can we look at the code, please. It is in the first  
 2 volume of V, which will be provided to you, in tab 5.  
 3 **A. I have it.**  
 4 Q. We have seen that this comes into effect, or came into  
 5 effect on 3 December 2003, that is paragraph 1.2.1, and  
 6 at 1.3.3 applies to any firearms and less lethal  
 7 weapons, so would include the CSDC.  
 8 **A. Yes.**  
 9 Q. If we can go forward, please, to the relevant part  
 10 concerning development and approval, which is 4.3.  
 11 Under 4.3.1 -- and I am going to take this  
 12 relatively shortly because we have been over it twice  
 13 now, and you will be, I suspect, familiar with these  
 14 paragraphs.  
 15 Paragraphs 4.3.1, 3.2 and 3.3, read together, make  
 16 it clear, don't they, that the development of a weapons  
 17 system should be centrally coordinated and that should  
 18 be normally through ACPO?  
 19 **A. Yes.**  
 20 Q. Did you have that understanding in 2007?  
 21 **A. No, because my view at the time, and I am thinking back**  
 22 **now to -- I didn't see the CSDC per se as a new weapons**  
 23 **system because I was acting in the belief that CS, as**  
 24 **a chemical irritant, had already been approved by the**  
 25 **Secretary of State. And the fact that we were trying to**

Page 8

1 **deliver something as a safer option, as an alternative**  
 2 **to RIP, and this was actually a different mechanism, if**  
 3 **you like, of delivery.**  
 4 Q. That is an answer to a different question, which was  
 5 about the CSDC. I was simply asking whether you  
 6 regarded the position in 2007 as being that the  
 7 development of a new weapons system required to be  
 8 centrally coordinated through ACPO?  
 9 **A. I think, as a new weapons system, yes.**  
 10 Q. Now, you just said something there to apply that to the  
 11 CSDC, and you said that you didn't regard this as a new  
 12 weapons system. Is that right?  
 13 **A. Yes.**  
 14 Q. That was because the thing that was inside the weapons  
 15 system was, itself, already authorised?  
 16 **A. Yes. That was my understanding at the time. I know now**  
 17 **with hindsight, and what I know about the codes of**  
 18 **practice, it quite clearly is a new weapons system.**  
 19 Q. Why did you think that? Why did you think that, because  
 20 the chemical inside an object might be the same as was  
 21 used in a CS incapacitant spray, it wasn't a new weapon  
 22 system. Isn't that a bit like saying, "The Home  
 23 Secretary has authorised the use of a MP5 which contains  
 24 bullets, we now want to introduce the Glock, that  
 25 contains bullets, the Glock is authorised"?

Page 9

1 **A. I can see your point, but I think I was looking at what**  
 2 **the intention was of the device, and that was to deliver**  
 3 **the CS as an incapacitant.**  
 4 Q. But the intention of the MP5 is to deliver bullets and  
 5 the intention of the Glock is to deliver bullets. You  
 6 say that you can see what I am saying, isn't it plain  
 7 and obvious that just because the object or substance  
 8 within a device is the same, does not mean that when you  
 9 use a new delivery system it is not a new weapon system?  
 10 **A. I mean, that is the way I saw it at the time.**  
 11 Q. I am asking: why? Why would you think that, when on the  
 12 face of it, it is -- I am suggesting, that it is obvious  
 13 that that is not so.  
 14 **A. I don't know why I thought that. I think I probably**  
 15 **referenced with what was in the Manual of Guidance which**  
 16 **actually mentioned that CS irritant was the only**  
 17 **approved chemical irritant or incapacitant by the**  
 18 **Secretary of State, and I think that is what had**  
 19 **directed me.**  
 20 Q. CS incapacitant spray is a handheld object with no  
 21 explosive capability. Admittedly, the CSDC didn't have  
 22 a pyrotechnic element to it. You can deliver quantities  
 23 of it, it is handheld by an officer, and was intended  
 24 for front line policing. This was very, very different  
 25 to that, wasn't it, it was a grenade effectively, or

Page 10

1 a canister?  
 2 **A. Yes, but I wasn't directly comparing it to CS spray,**  
 3 **I was comparing it to, if you like, RIP round, which**  
 4 **contained micronised CS.**  
 5 Q. So it was the comparison with the RIP round that led you  
 6 to think that this was not a new weapon system?  
 7 **A. Well, and both, and the spray as well, but it didn't**  
 8 **strike me, when I was considering it as delivery of CS**  
 9 **that it was actually a new weapon system that fit within**  
 10 **the code.**  
 11 Q. Did you discuss that approach with anyone; "Look, we  
 12 don't have to comply with the codes, the code, because  
 13 CS incapacitant is already licensed, as is CS in a RIP  
 14 round"?  
 15 **A. I must have discussed it with Inspector Holmes at some**  
 16 **point but I think that was talking around in terms of**  
 17 **where we were and with HOSDB. Because my understanding**  
 18 **was we were taking advice and guidance from HOSDB, in**  
 19 **terms of our research.**  
 20 Q. Who told you that you were taking advice and guidance  
 21 from HOSDB?  
 22 **A. Well, that was the impression I got from**  
 23 **Inspector Holmes, so it would have been**  
 24 **Inspector Holmes.**  
 25 Q. How did he give you the impression?

Page 11

1 **A. I think when we were talking it through, because one of**  
 2 **things I wanted to be sure around was the fact about the**  
 3 **CS that was in the canister was within the limits that**  
 4 **was set by HOSDB.**  
 5 **Because I remember the original canister, I think,**  
 6 **contained 12 grams, and my concern was: well, that is**  
 7 **over what the guidance of HOSDB given the manual of**  
 8 **guidance in terms of the other available CS delivery**  
 9 **methods. So, therefore, we need to bring it in line**  
 10 **with what HOSDB recommend for single units.**  
 11 Q. I think in your witness statement you say, if we look,  
 12 please, at paragraph 7. At the foot of the page there,  
 13 you are talking about, here, a letter from CSI, I think  
 14 dated March 2017, concerning the particle size in the  
 15 device, and you say:  
 16 "I believe this would have been shown to me to  
 17 confirm that the CS was to the standard I wanted to  
 18 ensure."  
 19 Is that what you are talking about there?  
 20 **A. Yes.**  
 21 Q. Over the page:  
 22 "I was therefore of the view that the device  
 23 contents contained CS of an approved weight and size  
 24 and, to my belief at the time, CS as an irritant had  
 25 been approved by the Home Office for police use, and the

Page 12

1 deployment of CS into vehicles by using RIP was  
 2 a national tactic."  
 3 Yes?  
 4 **A. Yes.**  
 5 Q. I don't think you say in the statement here that you  
 6 therefore regarded it as unnecessary to comply with the  
 7 code of practice, do you?  
 8 **A. I didn't have a view directly that it shouldn't comply**  
 9 **with the code of practice. What I think I am trying to**  
 10 **say is, and my knowledge at the time, it wasn't a case**  
 11 **of disregarding the codes of practice. It was a case of**  
 12 **my knowledge was, and I thought, that CS was approved by**  
 13 **the Home Secretary. And, as such, that was authorised.**  
 14 Q. Did you consult the codes at all before presenting the  
 15 paper on 12 June?  
 16 **A. I think I will have read the codes, yes.**  
 17 Q. You would have seen, I think in these paragraphs, in  
 18 particular paragraph 4.3.3:  
 19 "Where ACPO regard a new weapons system as suitable,  
 20 it should consult the Secretary of State to obtain the  
 21 Secretary of State's views on the suitability and  
 22 independence of bodies invited to carry out technical  
 23 and medical evaluations ..."  
 24 Et cetera.  
 25 **A. Yes.**

Page 13

1 Q. Did you think when you read the code it is necessary,  
 2 firstly, for ACPO to be involved in some way in this  
 3 and, secondly, somebody needs to consult the Secretary  
 4 of State to find out who he or she would regard as  
 5 a suitable and independent body to carry out firstly  
 6 technical and then medical evaluations of the device?  
 7 **A. Yes, but I didn't think, at that stage, that that was my**  
 8 **role.**  
 9 Q. And why not?  
 10 **A. Because I think at that time we were evaluating it**  
 11 **ourselves to see if it was actually a viable proposition**  
 12 **to actually replace or to be used as well as RIP in**  
 13 **certain circumstances. And the intention for that would**  
 14 **be to take it to Firearms Policy Group for a decision as**  
 15 **to which way to go.**  
 16 Q. Do you mean this was effectively a preliminary step or  
 17 a pilot before approaching ACPO in the Secretary of  
 18 State for approval?  
 19 **A. Well, it wouldn't be my place to approach ACPO**  
 20 **because --**  
 21 Q. I don't mean you --  
 22 **A. Yes, I know.**  
 23 Q. -- before the force approached ACPO.  
 24 **A. Yes, because, ultimately, my understanding was that we**  
 25 **wanted to examine something first, to make sure it was**

Page 14

1 **viable, rather than approaching ACPO and the Secretary**  
 2 **of State for something that you know may not be utilised**  
 3 **or maybe not give value at the end.**  
 4 Q. I see. So this was -- searching for the correct word --  
 5 a pilot study?  
 6 **A. It was to find a replacement in terms of what the**  
 7 **occupational requirement was as a safer option than**  
 8 **delivering RIP. And, obviously, Inspector Holmes and**  
 9 **his team had done some research and evaluation of it and**  
 10 **worked with the manufacturers to bring the device in**  
 11 **line to what we believed were the HOSDB limits for CS.**  
 12 **And at that point, it seemed a viable proposition to**  
 13 **fake it to Firearms Policy Group for them to approve it**  
 14 **or otherwise.**  
 15 Q. But the approval that was given was for it to be used  
 16 and then rolled out on the streets of Manchester.  
 17 **A. Because, on the basis of the work that had been done,**  
 18 **I felt satisfied. Or I was reassured that the**  
 19 **evaluation, the testing we had done and the research**  
 20 **was, you know, suitable to put forward as**  
 21 **a recommendation.**  
 22 Q. But you have just said to us that you didn't regard any  
 23 of this as necessary at this stage, because this was  
 24 just a viability study. In fact what happened was  
 25 authorisation was given and it was used, many hundreds

Page 15

1 of canisters were purchased and then they were  
 2 subsequently used in the Greater Manchester police area.  
 3 How did that happen if you thought this was a viability  
 4 study and the next step would be approaching ACPO and  
 5 the Secretary of State?  
 6 **A. Well, that was a decision at Firearms Policy Group by**  
 7 **Mr Thompson.**  
 8 Q. But, Chief Inspector, you were at the meeting and the  
 9 outcome of the meeting was not: right, stage one has  
 10 been reached. Decision: let's approach ACPO, let's  
 11 approach the Secretary of State.  
 12 The decision was: this is approved for use, subject  
 13 to three provisos, none of which were approaching ACPO  
 14 or the Secretary of State.  
 15 Then, hundreds of canisters were purchased in the  
 16 next couple of months and they were used.  
 17 How can you say that you thought that this was just  
 18 a preliminary step when the approval that was in fact  
 19 given was to use?  
 20 **A. Well, it wasn't a preliminary step as such. It was a**  
 21 **process whereby we had come up with what we had**  
 22 **considered as a viable device as an alternative to using**  
 23 **RIP and a decision -- and it was taken to Firearms**  
 24 **Policy Group for a decision to implement it or not.**  
 25 **Mr Thompson or the group could have made a decision to**

Page 16

1 **do something else.**  
 2 **You know, based on what I knew at the time and what**  
 3 **we had done and what we were trying to achieve,**  
 4 **I thought it was suitable that it could be recommended**  
 5 **to use as a replacement for RIP in certain**  
 6 **circumstances.**  
 7 Q. Chief inspector, I am not understanding your answers,  
 8 I am afraid.  
 9 I was asking you about your state of knowledge  
 10 concerning these paragraphs of the code of practice, and  
 11 you said, I think, that you knew about them but they  
 12 were -- and I am summarising here -- presently  
 13 inapplicable to the stage that you were at because this  
 14 was a viability issue. You didn't want to approach the  
 15 Secretary of State or ACPO with a device that was  
 16 unsuitable. You wanted to make sure it was suitable  
 17 first. Yes?  
 18 **A. Well, I think it comes back to the fact that I didn't**  
 19 **see it as a new weapon system.**  
 20 Q. That is a different answer. That is a different point;  
 21 you that you regarded these paragraphs as inapplicable  
 22 because this was not a new weapon system. Which was it?  
 23 **A. Well, my view -- from memory at the time, my view would**  
 24 **be because I didn't consider it a new weapon system,**  
 25 **I didn't think we had to follow that process that is in**

Page 17

1 **the code of practice.**  
 2 Q. Did you give active consideration to that issue?  
 3 **A. I can't recall at the time, but if I thought -- if**  
 4 **I didn't think it was a new weapon system, I may have**  
 5 **looked at that and thought: well, that is not relevant**  
 6 **in these circumstances.**  
 7 Q. Just winding forwards to the meeting of 12 June. We  
 8 heard from David Thompson, a former assistant chief  
 9 constable, and he said that he gave the approval that he  
 10 did because he was misled into believing that this was  
 11 a device that was already approved by the Secretary of  
 12 State, the CSDC, and was in use in Greater Manchester  
 13 Police for a different purpose, ie use in buildings, and  
 14 that this was just a different mode of operation, namely  
 15 using it on vehicle strikes.  
 16 **A. No, I mean, there was no intention by me to mislead**  
 17 **Mr Thompson in terms of the briefing that I had been**  
 18 **given by Mr Holmes. The CSDC hadn't been used up until**  
 19 **that point in buildings. It hadn't been used at all in**  
 20 **GMP, you know, and I was quite clear that I knew it**  
 21 **wasn't approved or hadn't been tested by the HOSDB,**  
 22 **which is a point I wanted to get across because that was**  
 23 **one of the concerns or one of the issues that needed to**  
 24 **be discussed.**  
 25 Q. I am going to about back to the beginning of trail,

Page 18

1 there. We can put the two things you said about the  
 2 code to one side now and we can put that bundle away.  
 3 Can we take out, in the same volume, volume 1,  
 4 tab 9, please. This is an email, dated 18 January, from  
 5 John Hart to Mr Smith. Graham Smith in PSDB, which  
 6 became HOSDB. I don't think you would have been the  
 7 chief inspector at this time?  
 8 **A. I wasn't, sir, no.**  
 9 Q. It was another year and a half before you became head of  
 10 TFU. What function were you performing at this time?  
 11 **A. In 2005, I think I may have been in internal affairs**  
 12 **branch.**  
 13 Q. It shows, I think, that some research was being  
 14 undertaken about the CSDC, back in 2005. When you  
 15 joined in -- I think you said July 2006. Is that right?  
 16 **A. Yes.**  
 17 Q. Were you aware that the project had already started and  
 18 a lot of water had gone under the bridge?  
 19 **A. Not to that level of detail, sir, no.**  
 20 Q. When did you first become aware of the fact of the  
 21 project?  
 22 **A. I think I joined the firearms unit in 2006, in July, and**  
 23 **I think I took over in either October or November**  
 24 **because there was a handover period with my predecessor.**  
 25 **I would have been aware that Inspector Holmes was**

Page 19

1 **working on or evaluating the CSDC, and that was probably**  
 2 **around the time -- and I have got somewhere in my mind**  
 3 **that they would have been working on it for 18 months,**  
 4 **but I think it was around that time, certainly after**  
 5 **I had taken over properly.**  
 6 Q. This email, if we just read it together, firstly, was  
 7 this shown to you at the time, as far as you can recall?  
 8 **A. No, sir, no.**  
 9 Q. He, Mr Smith, says to -- I think it is PC Hart:  
 10 "Thanks for sending the grenade data sheets.  
 11 Unfortunately, they don't give me enough information to  
 12 enable me to comment on the suitability for your  
 13 application. Hopefully, the following will give you  
 14 an idea of what we would need to do to assess these for  
 15 you. The main things we would look for in an evaluation  
 16 is compliance with the operational requirement.  
 17 I assume the main aspects of your requirement would be  
 18 to minimise unintended injury and ensure effectiveness."  
 19 Then, he says:  
 20 "Effectiveness could be measured in this way."  
 21 And then:  
 22 "On the unintended injury side, there could problems  
 23 caused by excessively high concentrations of CS or  
 24 problems with the particle size or purity of the CS.  
 25 These would need to be assessed medically, probably by

Page 20

1 DSTL Porton Down. Other injury mechanisms could be via  
 2 excessive noise or fragmentation of the grenade. These  
 3 could be assessed by PSDB but mainly through medical  
 4 input."  
 5 Then, in the next paragraph:  
 6 "Before we could start any work on this, we would  
 7 need a clear requirement and request from ACPO and would  
 8 need to fit the project in with our other work. The  
 9 first steps would be to raise the issue at ACPO PUF or  
 10 WEF and get their support to pursue it. There may also  
 11 be policy issues associated with the use of this type of  
 12 weapon that would need to be addressed by ACPO or Home  
 13 Office Policy Unit."  
 14 When you joined the department and became head of  
 15 the unit, was it revealed to you that in the past PSDB  
 16 had said these things? There are about half a dozen  
 17 things that are said in this email.  
 18 **A. No, sir.**  
 19 Q. So it wasn't revealed that they had said that these  
 20 things needed to be done and, additionally, that they  
 21 had not been done?  
 22 **A. No, sir. I can't recall the contents of that email at**  
 23 **all or that discussion, in terms of what had taken place**  
 24 **with PSDB.**  
 25 Q. Inspector Holmes has told us that PC Harte was

Page 21

1 an officer that he would have tasked to go off and  
 2 conduct some research, he thinks. Can you think of  
 3 a good reason why you wouldn't have been told that PSDB  
 4 had said things like, "You haven't given us enough  
 5 information. You need to get ACPO involved. You need  
 6 evaluation against the operational requirements. There  
 7 needs to be medical testing. There needs to be  
 8 assessment at Porton Down", for example, "There may be  
 9 policy issues for the Home Office".  
 10 All of those kinds of things. Can you think of  
 11 a good reason why you wouldn't be told that?  
 12 **A. I can't think now, sir.**  
 13 Q. You agree this exchange, here, rather suggests that both  
 14 the author and the recipient would realise that this was  
 15 a new weapons system because it is saying you need to do  
 16 things -- although it doesn't reference directly the  
 17 code of practice -- that are set out in the code.  
 18 **A. Yes. But, I mean, as we say, it is 18 months before**  
 19 **I arrived there. So, you know, what you are saying is**  
 20 **relevant, quite clearly, but I had no knowledge of that**  
 21 **discussion that had taken place.**  
 22 Q. One of the things raised here is the need to go off for  
 23 medical assessment, probably at DSTL Porton Down, of the  
 24 particle size, yes, of the CSDC in the canister?  
 25 If we jump forwards a little bit, to tab 15. Do you

Page 22

1 have tab 15 there?  
 2 **A. Yes.**  
 3 Q. It is a "To whom it may concern" letter of 5 March, when  
 4 you were in post, saying:  
 5 "This is to confirm the particle size for the powder  
 6 is ..."  
 7 Yes?  
 8 **A. Yes.**  
 9 Q. I think that is a document that was part of your  
 10 presentation at the Firearms Policy Group. That  
 11 document, if you just keep a finger in that and then go  
 12 forward to tab 21.  
 13 **A. Yes.**  
 14 Q. Do you have 21?  
 15 **A. Yes.**  
 16 Q. Can you see reference E is manufacturer letter regarding  
 17 micron size?  
 18 **A. Yes.**  
 19 Q. Did you regard it as appropriate to present to the FPG  
 20 a "To whom it may concern" letter, from the company  
 21 Combined Systems Inc, as I think the only data on the  
 22 concentration of CS, the particle size or the purity of  
 23 CS?  
 24 **A. Well, I think that was, as far as I recall, that was to**  
 25 **give some reassurance that actually that we had enquired**

Page 23

1 **into the size of the particle size of the CS.**  
 2 **I accept what you are saying, that it is not a very**  
 3 **professional letter. But, you know, I was satisfied**  
 4 **that we were dealing with an established company. You**  
 5 **know, that was --**  
 6 Q. How were you satisfied that you were dealing with  
 7 an established company?  
 8 **A. Well, I think from some of the information that I got**  
 9 **about the company itself and the fact that it supplied**  
 10 **equipment over a number of years to law enforcement**  
 11 **agencies and military worldwide. And it was on the**  
 12 **approved importers with one of our approved suppliers.**  
 13 Q. Sorry, it was?  
 14 **A. We were going through an approved supplier --**  
 15 Q. Beechwood?  
 16 **A. -- of equipment, which was Beechwood, and they were on**  
 17 **their list, or they were the ones that they were dealing**  
 18 **with. So it was coming through an official channel into**  
 19 **the UK.**  
 20 Q. Sorry, so the company was on a list of a company that  
 21 was on your list?  
 22 **A. Yes.**  
 23 Q. Did you regard that as satisfactory due diligence,  
 24 a "To whom it may concern letter" from a company that  
 25 was on a list that was on a list?

Page 24

<p>1 <b>A. From my view, it provided some integrity to the company.</b></p> <p>2 <b>It was not somebody that hadn't been -- not "vetted" is</b></p> <p>3 <b>the right word, but certainly it wasn't one that was</b></p> <p>4 <b>unknown.</b></p> <p>5 Q. Are you saying that CSI was not unknown?</p> <p>6 <b>A. Clearly not to Beechwood.</b></p> <p>7 Q. No, no, to you.</p> <p>8 <b>A. It would be unknown to me, but I would be taking account</b></p> <p>9 <b>of the fact that Beechwood had entered into an agreement</b></p> <p>10 <b>with them to import that equipment into the UK.</b></p> <p>11 Q. The email at tab 9 that we looked at, you said that it</p> <p>12 and the things in it were not drawn to your attention</p> <p>13 when you joined, or subsequently?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Can we move on then, please, to tab 17?</p> <p>16 <b>A. Yes, right.</b></p> <p>17 Q. Can you see an email from Inspector Holmes, at the foot</p> <p>18 of the page, dated 20 April 2007, to the American</p> <p>19 supplier?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Saying:</p> <p>22 "Dear sir, I am seeking to implement the use of the</p> <p>23 CS expulsion grenade to our firearms tactics as it</p> <p>24 provides the perfect solution to one of our most widely</p> <p>25 used tactics. I have almost managed to complete this,</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. -- from Inspector Holmes to Mr Smith again:</p> <p>2 "Thanks for your assistance in this matter. Are you</p> <p>3 able to provide me with any documentation, electronic</p> <p>4 will suffice, regarding the information supplied by the</p> <p>5 supplier and myself relating to micron size,</p> <p>6 composition. I have attached a copy of the letter</p> <p>7 regarding micron size and an EU standards safety data</p> <p>8 sheet provided by the UK supplier. I have also pasted</p> <p>9 a copy of my original email below, for your information.</p> <p>10 I don't want to seem too pushy, but we are keen to</p> <p>11 implement the equipment at the earliest opportunity."</p> <p>12 Were you made aware of this exchange, namely</p> <p>13 an approach to PSDB in the month before the June</p> <p>14 meeting?</p> <p>15 <b>A. No, sir.</b></p> <p>16 Q. You were not made aware, therefore, that there had been</p> <p>17 no reply to it before the meeting?</p> <p>18 <b>A. I wasn't aware, no, sir.</b></p> <p>19 Q. Can we turn back to tab 19, please. This is an email,</p> <p>20 I think from you to Chief Inspector Wood, who I think</p> <p>21 was the CFI at that time. Are you on tab 19?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And to Inspector Holmes, in the run-up to the 12 June</p> <p>24 meeting. It looks like you are just preparing for it,</p> <p>25 saying who has to do what in readiness for the meeting.</p> <p style="text-align: center;">Page 27</p>
<p>1 but I am having difficulties in finalising some health</p> <p>2 and safety issues. One matter was recently resolved in</p> <p>3 a letter from Jack Hananya regarding the particle size</p> <p>4 of the CS [which we have just looked at]. However, the</p> <p>5 only matter preventing me from introducing the grenade</p> <p>6 is a safety data sheet compliant with EU regulations.</p> <p>7 I have been dealing with Carl Smith of Beechwood UK.</p> <p>8 Are you able to assist?"</p> <p>9 Were you made aware of this exchange?</p> <p>10 THE CHAIRMAN: Which tab is that, sorry, Mr Beer?</p> <p>11 MR BEER: 17.</p> <p>12 <b>A. No, I wasn't, sir, no.</b></p> <p>13 Q. By April 2017, would you have agreed, if it had have</p> <p>14 been revealed to you, that the only matter preventing</p> <p>15 the introduction of the grenade was a safety data sheet?</p> <p>16 <b>A. I wasn't -- well, I was not aware at the time. I can't</b></p> <p>17 <b>remember exactly when I was actually fully briefed on</b></p> <p>18 <b>the canister. Because we were talking April now to,</b></p> <p>19 <b>I think, June was Firearms Policy Group, so it would</b></p> <p>20 <b>have been around that time, but I don't recall that</b></p> <p>21 <b>email.</b></p> <p>22 Q. Can we turn to tab 25 then, please. Can we look at the</p> <p>23 top of the second page, page 157. An email of 3 May, so</p> <p>24 getting closer to the meeting --</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 26</p>	<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. In the third paragraph, you say:</p> <p>3 "My backing papers are attached and Andy is going to</p> <p>4 do a briefing paper for the CS canister. I intend to</p> <p>5 film the deployment of this device to highlight its</p> <p>6 benefits and how it fits in the revised SOP, which will</p> <p>7 need your sign-off. This could then be shown at the</p> <p>8 next Firearms User Group, likely to be at the end</p> <p>9 of July."</p> <p>10 In fact, did you manage to film it before the</p> <p>11 Firearms Policy Group meeting on the 12th?</p> <p>12 <b>A. I can't remember, sir, no. I am aware a film was made</b></p> <p>13 <b>and produced, but I can't remember when that was.</b></p> <p>14 Q. It was Andy's, ie Inspector Holmes, responsibility to</p> <p>15 write the briefing paper. Is that right?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. Did you have any input into the briefing paper at all?</p> <p>18 <b>A. I can't remember whether I reviewed it in terms of</b></p> <p>19 <b>grammar and formatting but, in terms of the</b></p> <p>20 <b>detail/content, no.</b></p> <p>21 Q. What was the Firearms Policy Group?</p> <p>22 <b>A. Well, that was a strategic group that decided on all</b></p> <p>23 <b>firearms matters for the force, in terms of policy and</b></p> <p>24 <b>guidance, and gave direction.</b></p> <p>25 Q. What authority did it have in terms of the introduction</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 of a new weapons system or the modification, as I think  
 2 you would describe it, of an existing weapons system?  
 3 **A. Well, my understanding would be that it would be chaired**  
 4 **by an assistant chief constable with a delegated**  
 5 **responsibility from the chief constable to make**  
 6 **decisions on behalf of the force in relation to firearms**  
 7 **matters.**  
 8 Q. So before an item, such as a chemical weapon, was  
 9 authorised for use, it didn't require the chief officer  
 10 group, or similar, to sign it off because authority had  
 11 been delegated to a Firearms Policy Group?  
 12 **A. That would be my understanding, sir, yes.**  
 13 Q. Can we turn then to tab 21, which is the discussion  
 14 paper for the meeting on the 12th. We can see, at the  
 15 foot of the page, that it is dated the 11th. We can see  
 16 the references are A to E. Were these enclosures?  
 17 **A. I don't think they were sent electronically, sir, no.**  
 18 **Whether I took them with me, as physical papers, I can't**  
 19 **recall.**  
 20 Q. If neither of those things were done, ie electronic  
 21 distribution or table items, what would be the point of  
 22 having them as references?  
 23 **A. Well, there would be a reference point for the actual**  
 24 **reader, whether they wanted to refer to any documents**  
 25 **before they made any decisions or wanting to reassure**

Page 29

1 **themselves.**  
 2 Q. But some of the documents aren't referred to in the body  
 3 of the report, so the manufacturers' letter regarding  
 4 micron size, the COSHH assessment, the canister  
 5 information sheet, the data sheet, effectively, that is  
 6 the only mention of them, there. So it is not saying:  
 7 these are documents that you will find reference to  
 8 later in the text. It tends to suggest, in what I have  
 9 described as the military style, that a reference is  
 10 effectively a backing paper.  
 11 **A. Or a supporting document, yes.**  
 12 Q. Yes.  
 13 **A. Yes.**  
 14 Q. Can you help us as to whether these were supporting  
 15 documents?  
 16 **A. I can't recall sending them electronically, but I may**  
 17 **have had them with me, I think, as reference.**  
 18 Q. The paper begins:  
 19 "The GMP Tactical Firearms Unit currently deploys  
 20 officers on MASTS tactics which support covert  
 21 operations by force units and external agencies such as  
 22 SOCA. The ultimate aim for such operations is to arrest  
 23 suspects with a minimum danger to all persons."  
 24 Would you regard that as an accurate statement of  
 25 the MASTS platform?

Page 30

1 **A. It is one of the possible outcomes, but it would not**  
 2 **always result in arrest. But it is one of the outcomes**  
 3 **that you would use as a flexible means of deploying**  
 4 **officers, in terms of achieving an aim.**  
 5 Q. So it is accurate insofar as it goes, but not a complete  
 6 statement?  
 7 **A. You could expand on it and say that it has a number of**  
 8 **variations in terms of deployment.**  
 9 Q. "In general terms the operations are usually focused on  
 10 more experienced and determined criminals who are less  
 11 likely to be compliant with police officers. In order  
 12 to secure compliance and reduce the amount of risk to  
 13 all persons, the CS particles may be deployed by using  
 14 a shotgun round, RIP round, which provides immediate  
 15 effects resulting in the incapacitation of the subject.  
 16 Aim: to identify alternative delivery method for CS with  
 17 a reduced level of risk for all persons. Research: the  
 18 following have been consulted: HOSDB."  
 19 What was your understanding of the level of  
 20 consultation that had occurred with HOSDB?  
 21 **A. My understanding was that the project team consulted**  
 22 **with them and had taken advice on what they had been**  
 23 **told in terms of where we were going and what we were**  
 24 **looking to achieve.**  
 25 Q. Where did you get that understanding from? I think you

Page 31

1 realise now that is inaccurate?  
 2 **A. From Inspector Holmes. That would be a conversation --**  
 3 **because one of my questions was, you know: can HOSDB**  
 4 **test this device? Because ultimately HOSDB test on**  
 5 **behalf of the service equipment and devices that we**  
 6 **bring in, and I think the reason why they couldn't do**  
 7 **that was because there was a capacity issue in terms of**  
 8 **when it could be programmed into their work, so it could**  
 9 **be a long way off.**  
 10 Q. So you had been told: no, they can't?  
 11 **A. Hmm.**  
 12 Q. You had been told that it was because they were too busy  
 13 doing other things?  
 14 **A. That was my understanding, yes.**  
 15 Q. Inspector Holmes told you that, did he?  
 16 **A. Yes.**  
 17 Q. If we just look at your witness statement, please, at  
 18 tab 9, page 29, I don't think we see that in there.  
 19 (Pause)  
 20 Do we?  
 21 **A. No, but I think that was around my reassurance, in**  
 22 **paragraph 7. That I wanted to be reassured that it was**  
 23 **in line with the standards set by HOSDB.**  
 24 Q. But what you don't say is: I sought such reassurance and  
 25 was told that the scientists were too busy to help.

Page 32



1 Do you?

2 **A. No, but I ...**

3 Q. Do you?

4 **A. No.**

5 Q. When did you first remember that then?

6 **A. Well, my understanding was that HOSDB were not in**

7 **a position to test it.**

8 Q. When did you first remember that?

9 **A. I think that was the position I knew at the time, that**

10 **they were not in a position it test it, and that is why**

11 **I was looking for reassurance that, actually, the**

12 **content of the device and the weight of the CS was in**

13 **the standards already laid out by HOSDB. So it was**

14 **a case of: if they are not in a position to test it,**

15 **what can we do to try and bring it within those limits,**

16 **to make it as a viable option to put to the Firearms**

17 **Policy Group for a decision to make in those terms?**

18 Q. You do say in the statement that you said at the meeting

19 that HOSDB had not tested the weapon.

20 **A. Yes.**

21 Q. What you don't say in the witness statement is that you

22 knew that because of a conversation with

23 Inspector Holmes, and that he told you that they had

24 said that they had other work to do and couldn't do it.

25 What I am asking is: when you remembered that latter

Page 33

1 thing -- it is just that yesterday Inspector Holmes said

2 a very similar thing, and that was not in his witness

3 statement either.

4 **A. I think, well, I think that was my understanding. That**

5 **is what springs to mind, because the obvious question**

6 **is: why can't HOSDB test it? And I think it was a case**

7 **of -- I think the way HOSDB used to work was on**

8 **a project allocation basis.**

9 THE CHAIRMAN: I think, Mr Davies, you may be at cross

10 purposes with Mr Beer. He is not asking you, as

11 I understand it, when you knew. He is asking you when

12 you remembered, and that is in the context of your

13 witness statement. Am I right, Mr Beer?

14 MR BEER: Yes. Did you read the transcript of Mr Holmes'

15 evidence overnight.

16 **A. I didn't read it last night, sir, I read some of it this**

17 **morning.**

18 Q. So you knew, then, that there had been an approach to

19 the Home Office scientists and they said that they had

20 other work, greater priorities than this --

21 **A. Yes.**

22 Q. -- and, therefore, they couldn't help. I don't think it

23 says that in the paper, does it?

24 **A. No, it doesn't.**

25 Q. If we look at tab 21. The Assistant Chief Constable,

Page 34

1 Chief Constable as he now is, yesterday told us that he

2 read this as meaning the following had been consulted,

3 HOSDB, that they had been consulted in a positive way,

4 that they had contributed positively to the process.

5 Do you know why it wasn't revealed that, on the face

6 of the paper, that HOSDB, on your account, had said,

7 "I am sorry we can't help, we have other work to do"?

8 **A. I think the paper could be more specific, sir. But**

9 **I was quite clear in my own mind when I went there,**

10 **I knew the circumstances, that HOSDB had not examined**

11 **the canister.**

12 **And whether I said the reason why they haven't done**

13 **it is because there is a capacity issue and it is likely**

14 **to take some time before they could actually get round**

15 **to it, or it would have to be project initiated.**

16 **I don't recall, but I am aware that there was an issue**

17 **that they couldn't test it.**

18 Q. Why was it necessary for HOSDB to examine the canister?

19 **A. Because I saw that as them validating, I think, police**

20 **equipment, because that seemed -- that was the natural**

21 **route that equipment went through. You know, they were**

22 **a testing house, so police equipment would go through**

23 **the HOSDB to be tested and approved for police use.**

24 Q. So was it a surprise to you, when you read this paper,

25 that is not mentioned on the face of the paper at all;

Page 35

1 "We are asking to introduce a piece of police equipment.

2 The people that test police equipment before we

3 introduce it have refused to test it and, instead, the

4 paper is written up: the following have been consulted,

5 HOSDB"?

6 **A. I don't think it is a case they refused to test it.**

7 **I think my understanding was they were not in a position**

8 **to test it.**

9 Q. Yes, sorry, that is one part. I misdescribed it. Was

10 it a concern to you --

11 **A. It was important --**

12 Q. If you just let me finish the question.

13 Was it a concern to you that you knew that this

14 piece of equipment needed to be tested by HOSDB, HOSDB

15 haven't the capacity presently to test it, that the

16 paper had been written up, the following had been

17 consulted, HOSDB, full stop?

18 **A. Yes, it was an important factor that I needed to convey.**

19 Q. Can you think of a good, honest reason for that not to

20 be included in this paper?

21 **A. I can't, sir, no.**

22 Q. In particular, with the knowledge that you have now of

23 the email exchanges that we have looked at, between

24 Inspector Holmes and the HOSDB, they don't say, "We

25 haven't the capacity", they say, "You need to start from

Page 36

1 scratch by going to ACPO and follow the proper process".  
 2 Do you think you were being misled?  
 3 **A. I think it is difficult to say whether I was being**  
 4 **misled. I wasn't -- I wasn't given that information in**  
 5 **so many terms, in terms of "We can't test it because,**  
 6 **you have got to go and do this route", that was not my**  
 7 **understanding.**  
 8 Q. I know it wasn't your understanding, because you were  
 9 not told about it. Can you help us as to why you were  
 10 not told about it?  
 11 **A. I can't, sir, no.**  
 12 Q. Even the email which talks about capacity issues doesn't  
 13 say, "We haven't capacity". It says, "We will  
 14 reprioritise, or may have to reprioritise", doesn't it?  
 15 The GMP Health and Safety Unit was said to have been  
 16 consulted. What was your knowledge as to the level of  
 17 consultation with the Health and Safety Unit?  
 18 **A. Well, I mean, I was taken it read that Inspector Holmes**  
 19 **had done that, because what he had put down there --**  
 20 **that they had been consulted.**  
 21 Now, the manager of the Health and Safety Unit was  
 22 at the Firearms Policy Group that day, so I am presuming  
 23 that they would agree that there had been some  
 24 consultation taking place.  
 25 Q. If you just go over to tab 23, so we can identify them,

Page 37

1 which of those on the attendee list is that?  
 2 **A. I am sorry, sir, I have read a different set of minutes.**  
 3 **I was thinking of Marie Parkinson, which is obviously on**  
 4 **the subsequent Firearms Policy Group that I have read**  
 5 **somewhere.**  
 6 Q. I think that is October 2007.  
 7 **A. Oh right. You are quite correct that Marie was not**  
 8 **there, but it was my understanding that that**  
 9 **consultation had taken place.**  
 10 Q. So you didn't know the nature of it, you were just  
 11 working on the basis that if an inspector said there had  
 12 been consultation, it had been the right kind of  
 13 consultation, and it had been appropriate?  
 14 **A. Yes.**  
 15 Q. Does the same apply to the NPIA?  
 16 **A. It does, sir, yes, because I was aware there were**  
 17 **a number of GMP officers that were seconded to the NPIA**  
 18 **around that time. So I would have thought there would**  
 19 **be some sort of familiar exchange between those officers**  
 20 **and the ones back in force.**  
 21 Q. The paper continues at paragraph 7 and 8:  
 22 "TFU have researched possible delivery systems for  
 23 CS that takes away the need to use the shotgun rounds.  
 24 The only viable delivery system available is the CS  
 25 expulsion canister that is produced by CTS Tactical

Page 38

1 Systems US, whose sole importer to the UK is Beechwood  
 2 Equipment."  
 3 Over the page:  
 4 "The risk to individuals in the car from  
 5 fragmentation is reduced. Other systems were identified  
 6 and discounted due to their use of pyrotechnics. The  
 7 CTS canister operates from compressed air. The  
 8 suppliers have provided documentation regarding the  
 9 toxicity and handling of the equipment that comply with  
 10 health and safety requirements. This review and  
 11 research is within the spirit of the Code of Practice on  
 12 the Police Use of Firearms, paragraph 4.3.1."  
 13 Yes?  
 14 **A. Yes.**  
 15 Q. Your understanding, you have told the chairman, is that  
 16 because this item was discharging CS, and because CS was  
 17 already in use in the incapacitant spray in the RIP  
 18 round, compliance with the code of practice was  
 19 unnecessary.  
 20 **A. Well, that was my understand -- well, if I was making**  
 21 **the assumption or in the belief that it was approved --**  
 22 Q. The "it" in that sentence being CS?  
 23 **A. Yes. That I wouldn't think automatically we'd have to**  
 24 **follow the processes in the codes of practice.**  
 25 Q. So why isn't that explained in this paper to the

Page 39

1 Assistant Chief Constable. Because, at the moment what  
 2 we have, or it seems the evidence that the chairman is  
 3 receiving is that you didn't think compliance with the  
 4 code of practice was necessary because the object  
 5 contained CS, which gas was already authorised. The  
 6 Assistant Chief Constable didn't think compliance with  
 7 the code of practice was necessary, because he thought  
 8 that the CSDC was already authorised for use in  
 9 buildings, and this was just a different usage of  
 10 an already authorised item. Neither of those  
 11 explanations is evident on the face of this paper, is  
 12 it, ie the two different reasons for non-compliance with  
 13 the code of practice?  
 14 **A. It is not sir, no.**  
 15 Q. Can you help us as to how that has come about, that the  
 16 Chief Inspector presents to the assistant chief  
 17 constable a case for the introduction of CSDC, believing  
 18 that it is not necessary to comply with the code of  
 19 practice for reason A, and the Assistant Chief Constable  
 20 grants authorisation believing that it is not necessary  
 21 to comply with the codes of practice for reason B, and  
 22 both the Chief Inspector and the Assistant Chief  
 23 Constable are wrong because it is necessary to comply  
 24 with the codes of practice and neither the Chief  
 25 Inspector nor the Assistant Chief Constable's reasons

Page 40

1 for non-compliance appear on the face of the briefing  
 2 paper?  
 3 **A. I cannot think, sir, no.**  
 4 **One of the issues for me was that I knew it was not**  
 5 **HOSDB approved. You know, that was one of my concerns.**  
 6 **Where that sat with -- in terms of the codes of**  
 7 **practice, I am not sure, because we hadn't had any**  
 8 **central testing done.**  
 9 Q. Or is it the case that you and Inspector Holmes knew  
 10 that the code of practice needed to be complied with and  
 11 had not been complied with, and that is revealed by the  
 12 sentence:  
 13 "This review and research is within the spirit of  
 14 the code of practice."  
 15 **A. Well, I think when it is termed "in the spirit of the**  
 16 **code of practice", I think that is in relation to chief**  
 17 **officers looking out operational requirements of new**  
 18 **equipment. So I think it was in the spirit of that that**  
 19 **we have actually looked and found something.**  
 20 Q. He returns to that theme on page 3 of this document, at  
 21 paragraph 21, where he, Inspector Holmes, in his paper,  
 22 and I think you in presenting it, recommend the canister  
 23 for approval because, (b):  
 24 "It complies with the requirements of the code of  
 25 practice, paragraph 4.3.1 to monitor emerging

Page 41

1 requirements."  
 2 **A. Yes.**  
 3 Q. Do you realise now that if you don't go back to the  
 4 codes of practice and read where 4.3.1 sits, it misleads  
 5 a reader?  
 6 **A. I think without taking the full context, then possibly**  
 7 **it would, but my belief was at the time that it complied**  
 8 **with the code of practice.**  
 9 Q. Again, in that sentence, what was the "it"?  
 10 **A. Sorry, the CS. The CS and in terms of the CSDC.**  
 11 **I didn't look upon it as a new system. I think that was**  
 12 **my interpretation.**  
 13 Q. Again, I don't think we see that in your witness  
 14 statement, either. If we just go back to your witness  
 15 statement at tab 9, pages 29 to 31.  
 16 I don't think it says there, anywhere, "I did not  
 17 regard this as a new weapons system and therefore  
 18 compliance with the code of practice was not necessary"?  
 19 **A. No, but I do talk about CS being an irritant approved by**  
 20 **the Secretary of State.**  
 21 Q. You do, which we have looked at a moment ago.  
 22 Given, I think, when you made this witness  
 23 statement, you would have known that the issue was why  
 24 CSDC had not been introduced in accordance with the code  
 25 of practice and/or after approval by the Secretary of

Page 42

1 State, why isn't it in your witness statement that the  
 2 reason why the code of practice hadn't been complied  
 3 with was because you did not regard this as a new  
 4 weapons system?  
 5 **A. I don't know, sir. In other words, I looked at it as**  
 6 **CS, and I am trying to think back in terms of my**  
 7 **rationale and my understanding, and that was my**  
 8 **understanding, I believed, at the time.**  
 9 Q. Paragraph 21B of the document, the briefing paper, has  
 10 picked out part of the code of practice, 4.3.1, which  
 11 relates to the obligation on chief officers of police to  
 12 monitor emerging operational requirements and the  
 13 availability of new weapons systems. That was something  
 14 that Greater Manchester Police had complied with, hadn't  
 15 they? Hadn't it?  
 16 **A. Yes.**  
 17 Q. Because the emerging operational requirement was lots of  
 18 vehicle strikes on dangerous criminals, in vehicles, who  
 19 may need the RIP round to stop them; RIP round may be  
 20 dangerous; therefore, we look for a new weapons system;  
 21 CSDC is it.  
 22 So that is doing what part of the code of practice  
 23 required, yes?  
 24 **A. Yes.**  
 25 Q. The rest of the code, 4.3.2, 3, 4 and 5, which is what

Page 43

1 you do after you have noticed the new operational  
 2 requirement and/or a system that might improve dealing  
 3 with it, was not complied with, was it?  
 4 **A. I accept that now, sir, yes.**  
 5 Q. Do you know why this paper has printed the part of the  
 6 of the code of practice that GMP had complied with, but  
 7 not the parts that it hadn't?  
 8 **A. No, sir.**  
 9 Q. The if we go on to the tab 23 -- sir, in fact that might  
 10 be a convenient moment?  
 11 THE CHAIRMAN: Right, yes, I hadn't realised we were so far  
 12 into the morning.  
 13 Yes, five minutes, we will take a break.  
 14 (11.43 am)  
 15 (A short adjournment)  
 16 (11.55 am)  
 17 MR BEER: Chief inspector, you say in paragraph 10 of your  
 18 witness statement:  
 19 "I recall that although the paper does state that  
 20 HOSDB had been consulted, I made it clear [this is at  
 21 the meeting] that HOSDB had not directly tested the  
 22 device, nor had they approved it. However, based our  
 23 testing, evaluation and consultation, permission to  
 24 introduce it was to be sought at this meeting."  
 25 **A. Yes.**

Page 44

1 Q. So you told the Assistant Achieve Constable that  
 2 HOSDB -- and you say had "not directly tested the  
 3 device". What did you mean by "not directly tested the  
 4 device"?

5 **A. Well, I suppose I mean they hadn't tested it. So they**  
 6 **hadn't looked at it but, you know, they had given some**  
 7 **views on it, in terms of the consultation that had taken**  
 8 **place.**

9 Q. Did you know what their views were?

10 **A. No. Not to the point of the email that came on 13 June,**  
 11 **no.**

12 Q. But did you know their views at all?

13 **A. I didn't think their views were negative.**

14 Q. Was that understanding from Inspector Holmes?

15 **A. Yes.**

16 Q. You say:

17 "Nor had they approved it. However, based on our  
 18 testing, evaluation and consultation, permission to  
 19 introduce was being sought at this meeting."

20 **A. Yes.**

21 Q. You don't say there "Permission to go to ACPO and then  
 22 to the Secretary of State, to take to the next stage,  
 23 was sought at this meeting", do you?

24 **A. No.**

25 Q. If what you said earlier was the case, namely that you

Page 45

1 thought this was very much only a step in the process,  
 2 and the steps required by the code of practice would  
 3 come later, why is that not here?

4 **A. I think I was of the view, we had taken it as far as we**  
 5 **could in terms of the work that we had done, and it was**  
 6 **a decision for Firearms Policy Group as to what the next**  
 7 **steps would be.**

8 Q. But the recommendation wasn't: we recommend that  
 9 Firearms Policy Group should decide what the next step  
 10 should be.

11 Or: Firearms Policy Group should decide now how to  
 12 comply with the code of practice.

13 Or: Firearms Policy Group should approach ACPO and  
 14 then the Secretary of State.

15 Was it? The recommendation was: introduce the  
 16 device.

17 **A. Based on what we had done, sir, yes.**

18 Q. If it was your view that this was only a first step, why  
 19 wasn't the recommendation, that first step having been  
 20 completed, the next steps should be undertaken?

21 **A. Well, my understanding for the next steps, that would be**  
 22 **for a new system. And I think, as I said earlier on,**  
 23 **that I didn't necessarily consider that the CSDC was**  
 24 **a new system in itself for the codes of practice.**

25 Q. I see, so in fact you didn't think there were any next

Page 46

1 steps at all?

2 **A. No. Apart from the decision to be made regarding**  
 3 **whether to recommend to be brought into service or**  
 4 **resolve the issue with HOSDB not being able to test it.**

5 Q. If you look at tab 24, please, that night I think you  
 6 sent an email to Inspector Holmes from your BlackBerry,  
 7 and you say:

8 "Approved by ACC Thompson on the understanding  
 9 detailed risk assessment documented, HOSDB have been  
 10 consulted and this is documented in terms of their  
 11 written response. Gold and silvers are a briefing sheet  
 12 for their info re use."

13 Yes?

14 **A. Yes.**

15 Q. In terms of detailed risk assessment, did you understand  
 16 that there wasn't a detailed risk assessment at that  
 17 time?

18 **A. No, I think I would be aware, I am sure, that a risk**  
 19 **assessment would have already been in place to do the**  
 20 **evaluation for the device because that would be the**  
 21 **standard procedures, so there would be a risk assessment**  
 22 **in place.**

23 Q. The enclosures, or table items, to the briefing paper  
 24 didn't list a risk assessment as amongst the enclosures,  
 25 did it?

Page 47

1 **A. No, sir, no.**

2 Q. Do you know why that was?

3 **A. I don't, sir, no. I think it is obviously an omission.**

4 Q. Because one existed at that time, didn't it?

5 **A. I have seen a risk assessment, sir, but I can't recall**  
 6 **whether it is prior to that date.**

7 Q. Yes, if you look at tab 14, please.

8 **A. Yes, I have it. Yes.**

9 Q. Can you see it is dated 13 January 2007, reviewed on  
 10 20 July 2008?

11 **A. Yes.**

12 Q. Do you know why that wasn't presented to the FPG?

13 **A. I don't sir, no.**

14 Q. Wouldn't, if you were asking FPG to authorise the  
 15 introduction of even a new use of a device, the FPG have  
 16 wished to know whether a risk assessment had been  
 17 conducted and, if so, what it said?

18 **A. Yes. Yes, it is a good point, sir.**

19 Q. If you look at the risk assessment, at the second page,  
 20 page 116?

21 **A. Yes.**

22 Q. Can you see the risk assessment that would have been  
 23 conducted identifies for the use of CSDC in vehicles,  
 24 "injury to operator; (b) injury to other armed officers;  
 25 or (c) injury to unarmed officers."

Page 48

1 It doesn't identify injury to people in the car?  
 2 **A. Yes.**  
 3 Q. Which I suppose is always a risk, isn't it?  
 4 **A. It is but this may supplement or complement other risk**  
 5 **assessments in place for the tactics that are taking**  
 6 **place as well, so if there is an interception of**  
 7 **a vehicle during a MASTS, then I would expect that there**  
 8 **would be a risk assessment for that as well.**  
 9 Q. Are you saying that that properly explains the focus  
 10 only on risks to police officers and not to members of  
 11 the public in this risk assessment?  
 12 **A. No, ideally, sir, it should be in there. I accept that.**  
 13 Q. Do you know whether it was because that flaw had been  
 14 identified that the risk assessment was not put in front  
 15 of the ACC?  
 16 **A. Sir, not to my knowledge, no.**  
 17 Q. Going back to tab 24, please, one of ACC Thompson's  
 18 provisos was HOSDB have been consulted and that this is  
 19 documented in terms of their written response.  
 20 Did you understand that to mean the production of  
 21 documentation to show the consultation that has already  
 22 taken place with HOSDB needs to be produced?  
 23 **A. No, I think I took that to mean that we had approved it,**  
 24 **or Mr Thompson had approved the device in force, and we**  
 25 **were to inform HOSDB of that and get their response from**

Page 49

1 **them, in terms of that decision that was being made.**  
 2 Q. It says "HOSDB have been consulted", not "HOSDB are to  
 3 be informed". The way you are speaking is as if you  
 4 were going to tell them what you have done, as a matter  
 5 of information. Is that what you understood the  
 6 Assistant Chief Constable to have decided?  
 7 **A. It may have been, because obviously I was aware that**  
 8 **consultation had taken place with them, or discussion**  
 9 **had, so this was about updating them that actually we**  
 10 **had made the decision that we were going to bring the**  
 11 **device into service.**  
 12 Q. Why does it say "HOSDB have been consulted", rather than  
 13 "HOSDB are to be informed"?  
 14 **A. I don't know, sir. It might be just my grammar.**  
 15 Q. If you go forwards to tab 25, we can see that the day  
 16 after you wrote your email on 13 June 2007, HOSDB did  
 17 respond, albeit they were responding to an email that  
 18 had been sent in May, not to knowledge of the  
 19 introduction of, or decision to introduce, the device.  
 20 Before these proceedings, had you ever seen this  
 21 email?  
 22 **A. No, sir. To the best of my knowledge I had never seen**  
 23 **it.**  
 24 Q. Given that you had told the recipient of the email,  
 25 Inspector Holmes, by your email of the previous night,

Page 50

1 that HOSDB were to be consulted and their written  
 2 response was to be documented, can you think of a good  
 3 reason for you not to be shown this email?  
 4 **A. I can't, sir, no.**  
 5 Q. If you had been shown the email, what would you have  
 6 done?  
 7 **A. Well, my likely action would have been to put it to**  
 8 **Mr Thompson to say, in light of the decision that he had**  
 9 **made the previous day, you know, this is the response we**  
 10 **have had back from HOSDB, you know, what do you propose?**  
 11 **It would have started a debate I am sure.**  
 12 Q. Would you have recommended suspension of the approval,  
 13 at the very least, of the device?  
 14 **A. I think we would want some more reassurances in terms of**  
 15 **what we had done, in terms of the advice now we had got**  
 16 **from HOSDB as to which way to go but I think, you know,**  
 17 **that would be a decision for Mr Thompson, because now we**  
 18 **are being pointed in the direction of the code of**  
 19 **practice.**  
 20 Q. Well, it does a bit more than point you in the direction  
 21 of the code of practice, doesn't it, it says that is one  
 22 thing you need to do, you need to comply with the code  
 23 of practice, and it says this is how you do it, and then  
 24 it says that, looking at the information that you have  
 25 provided, if I was asked to look at the device, these

Page 51

1 are the types of thing that I would do, namely for  
 2 particle size I would want to verify the manufacturers'  
 3 statement, maybe not just go off a "To whom it may  
 4 concern" letter, send it to the Atomic Energy Authority  
 5 at Harwell, for example, or an independent test lab; for  
 6 purity I would want to send that to an independent test  
 7 lab or do our own analysis; for concentration or  
 8 irritant payload I would want to recommend independent  
 9 verification. I am concerned there is a chemical that  
 10 I have never heard of and I would want independent  
 11 analysis of the composition of the mixture. I would  
 12 want a competent viewpoint, HOSDB has not got medical  
 13 expertise to do that.  
 14 **A. Yes.**  
 15 Q. So would it not have done a bit more than start  
 16 a conversation about what to do. Wouldn't it have  
 17 caused you to say, "Look, Mr Thompson, you need to  
 18 suspend your approval"?  
 19 **A. Well, it would, sir, yes, there would be a discussion**  
 20 **over that and I am sure Mr Thompson would probably look**  
 21 **at it in that similar vein.**  
 22 Q. Put it this way, when you first read this email in the  
 23 last three or four months, what was your reaction?  
 24 **A. Well, I was surprised by content, sir, because to the**  
 25 **best of my knowledge that is the first time that I have**

Page 52

1 **seen that and, quite clearly, the content that is in it,**  
 2 **it would stand out to me to say, well, just a minute,**  
 3 **you know, there are things here that we are not aware**  
 4 **of.**  
 5 Q. So were you shocked to see it?  
 6 **A. I was, sir, yes.**  
 7 Q. Now you have told the chairman already that  
 8 Inspector Holmes was an excellent officer, somebody in  
 9 whom you had high confidence in, yes?  
 10 **A. Yes, sir.**  
 11 Q. He worked to very high standards, as you would expect of  
 12 your staff, and if he completed a task he would do it in  
 13 a thorough manner?  
 14 **A. Yes.**  
 15 Q. On the basis of the evidence that you have given the  
 16 chairman, he has withheld this email from you, yes?  
 17 **A. Well, it would appear that I have not received it, sir.**  
 18 Q. You think it might have got lost in the system or --  
 19 **A. All I can say is that I have obviously searched all my**  
 20 **records that I've got. I can't find the email. I can't**  
 21 **personal recall having received it. So therefore I am**  
 22 **left with the presumption that I never received that**  
 23 **email.**  
 24 Q. But it is not just about sending and receiving emails,  
 25 and technology, it is a bit wider than that, isn't it?

Page 53

1 Because if he had sent it and it had gone into the  
 2 ether, there would have to be some discussion about it?  
 3 **A. Yes.**  
 4 Q. So it is the issues that it raises were not brought to  
 5 your attention?  
 6 **A. No, as far as I recall there was no conversation. If we**  
 7 **take where the email went out of it, there was no**  
 8 **conversation that I can recall that brought these**  
 9 **matters to my attention.**  
 10 Q. Now, can you think why that might be?  
 11 **A. Well, I know I was away from the office for a week, sir,**  
 12 **because I was conscious that on 12 June, when I finished**  
 13 **the Firearms Policy Group, that I sent the actions to**  
 14 **Inspector Holmes from FPG, that I was going to be away**  
 15 **I think overseas on police business for a few days and**  
 16 **then I was off for several days. So I think it was**  
 17 **either a week before I was back in the office -- so**  
 18 **I wanted to make sure we got things done. So there is**  
 19 **a gap there where we have not actually spoken to each**  
 20 **other.**  
 21 Q. So what, you think this might have just got lost in  
 22 a week or so of you being away?  
 23 **A. Well, it is surprising that it did in terms of the**  
 24 **content that is in there.**  
 25 Q. Was there a desire to drive through the CSDC's

Page 54

1 introduction?  
 2 **A. Not that I can recall, sir, no.**  
 3 Q. Was there a common understanding between you and  
 4 Inspector Holmes that compliance with the code of  
 5 practice would slow down the introduction of the device  
 6 or prevent the introduction of the device into GMP?  
 7 **A. No, sir, no. It was purely to bring in a safer option**  
 8 **when using a RIP round, because the RIP was already**  
 9 **authorised, which could still be used. This was purely**  
 10 **on the grounds of safety and the fact that it was useful**  
 11 **as a contingency in vehicle based resolutions.**  
 12 Q. In paragraph 6 of your witness statement, you conclude  
 13 it by saying "It was alterations such as these that led  
 14 me to believe that we had followed a rigorous and  
 15 thorough assessment of the device", yes?  
 16 **A. Yes.**  
 17 Q. The alterations that you are speaking about there are  
 18 asking the manufacturer to reduce from 12 down to  
 19 5 grams the payload of the device?  
 20 **A. Yes.**  
 21 Q. So you actually gave thought to that issue?  
 22 **A. I did, sir, yes.**  
 23 Q. Did that not cause you to think in your mind that this  
 24 device may have been designed to discharge 12 grams of  
 25 CS, it is not suitable for discharging 5 grams of CS?

Page 55

1 **A. I didn't think it was not suitable, sir, no. You know,**  
 2 **I was just conscious of the fact that there are**  
 3 **references to maximum amount of CS that can be used in**  
 4 **a single device, which I think is 5 grams, so I was**  
 5 **conscious of bringing it within those limits because I**  
 6 **was mindful that HOSDB hadn't tested it and I didn't**  
 7 **want to introduce something that may be seen as**  
 8 **disproportionate to what was already available.**  
 9 Q. In your email at tab 25, in the third paragraph you say:  
 10 "I have said that we will present at the next  
 11 Firearms User Group."  
 12 **A. Sorry, which tab, sir?**  
 13 Q. Sorry, tab 24, my mistake. 24, your email to  
 14 Inspector Holmes.  
 15 **A. Yes.**  
 16 Q. "I have said that we will present at the next Firearms  
 17 User Group and suggest we don't use until then."  
 18 The part of the sentence that says "and suggest we  
 19 don't use until then", were you meaning suggest we don't  
 20 use the devices until then?  
 21 **A. Yes.**  
 22 **It was all about raising the awareness between**  
 23 **silver commanders and TAC advisers of the device itself**  
 24 **and what it can do, what its characteristics are. So**  
 25 **I had in my mind that firearms commanders need to be**

Page 56

<p>1     <b>aware of the availability of this as a special munition,</b>  2     <b>should know what it can do, what its strengths are and</b>  3     <b>its limitations are, before they make an informed</b>  4     <b>decision about whether requesting it or not.</b>  5     Q. What about compliance with ACC Thompson's three  6     provisos? Was that necessary or could you just use it  7     in any event?  8     <b>A. No, I understand those to be necessary, sir; that</b>  9     <b>agreement had been given on the understanding that those</b>  10    <b>three provisos were done.</b>  11    Q. Now, we have seen the first purchase order, I think,  12    went in on 9 July 2007 for devices, and by the time the  13    next Firearms User Group convened in October -- sorry,  14    the Firearms Policy Group convened in October 2007, the  15    device had been used. By then, what documents had you  16    seen of consultation with HOSDB in terms of their  17    written response to your introduction of the device?  18    <b>A. I hadn't seen any, sir.</b>  19    Q. Who was responsible for passing those documents to the  20    Assistant Chief Constable?  21    <b>A. Well, it wasn't my understanding that they needed to be</b>  22    <b>passed to the ACC.</b>  23    Q. Whose responsibility was it to collect the written  24    response of HOSDB?  25    <b>A. That was the responsibility I passed to</b></p> <p style="text-align: center;">Page 57</p>	<p>1            <b>Obviously if something came back that was negative,</b>  2            <b>then that would be a different matter.</b>  3     Q. A bit like the email of 13 June.  4     <b>A. Yes.</b>  5     Q. It wasn't just negative, was it? That would have  6     represented an absolute block on the progress of the  7     project, wouldn't it?  8     <b>A. Well, it would have raised the profile on the</b>  9     <b>discussion, sir, yes.</b>  10    Q. You made preparations for the Firearms User Group  11    in July 2007, yes?  12    <b>A. Yes.</b>  13    Q. One of the items was the introduction of special  14    munitions, Of CSDC as a special munition?  15    <b>A. Yes.</b>  16    Q. By the time that the Firearms User Group was due to take  17    place, what conversations, if any, had you had with  18    Inspector Holmes about the satisfaction of  19    ACC Thompson's three conditions?  20    <b>A. I don't think I had had any, sir, to be honest.</b>  21    Q. The next step in the process was at the end of July, the  22    Chief Officer Policy Group, on 25 July. Did you make  23    any contribution to that meeting?  24    <b>A. No, sir.</b>  25    Q. On 12 October, the Firearms Policy Group met again, if</p> <p style="text-align: center;">Page 59</p>
<p>1            <b>Inspector Holmes, because he had the contacts with</b>  2            <b>HOSDB.</b>  3     Q. And did he tell you that he had got a positive response  4     from HOSDB then?  5     <b>A. I can't recall.</b>  6     Q. Was any subsequent step, or authorisation required  7     before the devices went live in terms of somebody  8     satisfying themselves that ACC Thompson's three provisos  9     had been satisfied?  10    <b>A. Not that I was aware of, sir, no. Of the three that</b>  11    <b>were given, they were within the knowledge and the</b>  12    <b>detail of Inspector Holmes as part of the project team</b>  13    <b>and I didn't see those being an issue when I asked that</b>  14    <b>they be done, and I thought he would only come back to</b>  15    <b>me if an issue was raised, so because I didn't hear</b>  16    <b>anything and because I trusted Inspector Holmes to do</b>  17    <b>the work, I didn't think that there was any issues with</b>  18    <b>those matters that had been resolved.</b>  19    Q. So ACC Thompson's three provisos could be satisfied by  20    Inspector Holmes both doing the work to satisfy them and  21    satisfying himself with the results?  22    <b>A. Yes.</b>  23    Q. He didn't need to communicate such satisfaction to any  24    other person?  25    <b>A. I didn't think it was necessary, sir, no.</b></p> <p style="text-align: center;">Page 58</p>	<p>1            we can go forward to tab 34.  2     <b>A. Yes, sir.</b>  3     Q. I think you were present at this meeting, first box,  4     second from the bottom?  5     <b>A. I was, sir.</b>  6     Q. And if we go forward to item 14:  7         "The use of the Beechwood canister was raised by  8         emergency service partners at a recent meeting,  9         following a review of its use in a firearms operation in  10        a dwelling. Concern was raised regarding the effective  11        eradication of excess irritant. Following consultation  12        with the manufacturer, incorrect loading of CS irritant  13        was discovered. Use of the canister has been suspended  14        pending the resupply with the correct load of 4 grams.  15        However, further research has been carried out by the  16        TFU into the use of PAVA irritants that has limited  17        lasting effects and can be washed away."  18        Amongst what must have been the first uses of CSDC,  19        led to the discovery that the manufacturer had loaded it  20        with too much CS irritant?  21    <b>A. It would appear so.</b>  22    Q. Was that of significant concern to you?  23    <b>A. Well, it was a matter that would have been investigated,</b>  24    <b>and that is why I suspended it. But at the time --</b>  25    <b>thinking back now, I am not sure whether, if that was</b></p> <p style="text-align: center;">Page 60</p>

<p>1 <b>the fact there was an incorrect loading or an incorrect</b></p> <p>2 <b>canister may have been taken for the operation, if some</b></p> <p>3 <b>had initially been supplied with 12 grams, which is what</b></p> <p>4 <b>the actual manufactured product is, which may have been</b></p> <p>5 <b>one of the trial ones as part of the evaluation stage.</b></p> <p>6 Q. That is not what the minute says, is it?</p> <p>7 <b>A. No. No.</b></p> <p>8 Q. It says:</p> <p>9 "Incorrect loading of CS irritant was discovered.</p> <p>10 Use has been suspended pending resupply with the correct</p> <p>11 load."</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Wasn't that a significant concern, that the manufacturer</p> <p>14 may have supplied you with more than double the amount</p> <p>15 of CS that was permitted, the 12-gram container?</p> <p>16 <b>A. Yes, it was, but I am not quite sure how we had arrived</b></p> <p>17 <b>at that decision, because, whether a canister goes off,</b></p> <p>18 <b>whether we know whether it had 5 grams in it or it had</b></p> <p>19 <b>12 grams in it, and whether there may have been some</b></p> <p>20 <b>identification on the actual device itself which led us</b></p> <p>21 <b>to the direction of it being 12 grams and not 5.</b></p> <p>22 Q. Now the authority that had been sought from ACC Thompson</p> <p>23 was the use of this device against subjects in</p> <p>24 a vehicle, wasn't it?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 61</p>	<p>1 discovered that the payload of 12 grams had been used?</p> <p>2 <b>A. I can't remember, sir.</b></p> <p>3 MR BEER: Yes, thank you very much.</p> <p>4 They are the questions that I ask.</p> <p>5 THE CHAIRMAN: Any questions, Ms Whyte?</p> <p>6 MS WHYTE: No thank you, sir.</p> <p>7 Questions from THE CHAIRMAN</p> <p>8 THE CHAIRMAN: Mr Davies, you told me that you wanted to be</p> <p>9 sure that the CS in the canister was within limits set</p> <p>10 by the HOSDB, and you confirmed just a few minutes ago</p> <p>11 to Mr Beer that the issue of payload was something to</p> <p>12 which you gave thought.</p> <p>13 Did it occur to you that there might in fact have</p> <p>14 been a very good reason for a higher CS content in</p> <p>15 a canister than in a handheld spray?</p> <p>16 <b>A. It didn't sir, no.</b></p> <p>17 THE CHAIRMAN: And that, by reducing that content in order</p> <p>18 to make it comply with the content in a wholly different</p> <p>19 method of delivery, you might be fundamentally altering</p> <p>20 the effectiveness of the system? That didn't occur to</p> <p>21 you?</p> <p>22 <b>A. Well, only so much as I would have thought that that</b></p> <p>23 <b>would have been discussed with the manufacturer, sir,</b></p> <p>24 <b>because clearly if we were trying to seek to reduce the</b></p> <p>25 <b>CS content in a device, the manufacturers may have</b></p> <p style="text-align: center;">Page 63</p>
<p>1 Q. Why was it being used in a building?</p> <p>2 <b>A. Because it would apply to buildings as well, was my</b></p> <p>3 <b>understanding.</b></p> <p>4 Q. Had authority been given for its use in a building?</p> <p>5 <b>A. I suppose technically not if you read the briefing</b></p> <p>6 <b>paper, sir, no.</b></p> <p>7 Q. All of the rationale for its introduction was focused on</p> <p>8 its perceived advantages over the RIP round, because of</p> <p>9 the danger to rear passengers in the vehicle, wasn't it?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. None of the justifications related to use in a building,</p> <p>12 did they?</p> <p>13 <b>A. No, but my presumption was that it could be used in</b></p> <p>14 <b>a building like RIP round could, because I think when</b></p> <p>15 <b>I wrote a paper later on at the request of Mr Thompson,</b></p> <p>16 <b>I think I actually put that it can be used in vehicles</b></p> <p>17 <b>and in premises.</b></p> <p>18 Q. The authority that Mr Thompson had given did not</p> <p>19 explicitly relate to buildings, did it?</p> <p>20 <b>A. No.</b></p> <p>21 Q. But you say that your understanding was that it could</p> <p>22 be, given the authority that he granted, used in both</p> <p>23 contexts, is that right?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. What was done with the manufacturer after it was</p> <p style="text-align: center;">Page 62</p>	<p>1 <b>a reservation about, well, it may not work as effective</b></p> <p>2 <b>as what it would do with 12 grams as it would with 5.</b></p> <p>3 THE CHAIRMAN: Didn't the very fact that you were having to</p> <p>4 consider adapting this device cause you to think that</p> <p>5 maybe this was something that should be looked into by</p> <p>6 qualified persons and that, therefore, it was in reality</p> <p>7 a new weapon system that had to be evaluated under the</p> <p>8 provisions of the code? Did that not occur to you?</p> <p>9 <b>A. It didn't sir, no.</b></p> <p>10 THE CHAIRMAN: Anybody want to ask anything arising out of</p> <p>11 that?</p> <p>12 Thank you that is the end of your evidence. You are</p> <p>13 free to go.</p> <p>14 MR BEER: Sir, I wonder whether we might take a slightly</p> <p>15 earlier break and then come back slightly earlier.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 MR BEER: I know that lunch arrangements in the building</p> <p>18 mean we cannot come back at 1.30, but so soon as before</p> <p>19 2.00 as lunch arrangements allow.</p> <p>20 THE CHAIRMAN: Yes.</p> <p>21 The rest of the day -- I think one more witness</p> <p>22 today -- and if we were to start at, I don't know, 1.50,</p> <p>23 would that give sufficient time? Or would you rather</p> <p>24 try and start earlier? It may be a little difficult for</p> <p>25 the reason you mentioned to start before then.</p> <p style="text-align: center;">Page 64</p>



<p>1 MR BEER: 1.50 is fine. Thank you.</p> <p>2 THE CHAIRMAN: Thank you very much.</p> <p>3 (12.27 pm)</p> <p>4 (The Luncheon Adjournment)</p> <p>5 (1.54 pm)</p> <p>6 THE CHAIRMAN: Mr Thomas, I think you are aware that</p> <p>7 Mr Grainger is not there at the moment. I not sure,</p> <p>8 from his point of view, that if he misses a few minutes</p> <p>9 of this --</p> <p>10 MR THOMAS: I think that will be fine in relation --</p> <p>11 I understand Mr Beer has a bit before I get to my feet,</p> <p>12 in any event.</p> <p>13 THE CHAIRMAN: Yes. Thank you very much.</p> <p>14 MR BEER: Mark Nutter, please.</p> <p>15 MR MARK NUTTER (sworn)</p> <p>16 THE CHAIRMAN: Thank you. You are free to sit down if you</p> <p>17 wish to do so, Mr Nutter.</p> <p>18 <b>A. Thank you, sir.</b></p> <p>19 <b>Questions from MR BEER</b></p> <p>20 MR BEER: Mr Nutter, my name is Jason Beer and I ask</p> <p>21 questions on behalf the Inquiry. To your left-hand</p> <p>22 side, there should be a cypher sheet. It may be</p> <p>23 necessary to refer to some of the officers, if you just</p> <p>24 check their names and see if they are on the cypher</p> <p>25 sheet and, if so, use the cypher, please.</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. What function do you perform nationally?</p> <p>2 <b>A. I am a member of the high threat and counter terrorism</b></p> <p>3 <b>armed policing team within the National Counter</b></p> <p>4 <b>Terrorism Policing Headquarters.</b></p> <p>5 Q. In 2012, March 2012, what function were you performing?</p> <p>6 <b>A. I was the inspector on the operations team in the</b></p> <p>7 <b>Tactical Firearms Unit of Greater Manchester Police.</b></p> <p>8 Q. When had you first become an AFO?</p> <p>9 <b>A. I first passed my initial course in 2001, and then I did</b></p> <p>10 <b>a second course in 2003 because I was promoted and</b></p> <p>11 <b>stayed on division. So I came back in 2003 to do</b></p> <p>12 <b>a second course, and then I joined the unit in 2004.</b></p> <p>13 Q. Were you trained and qualified as an SFO?</p> <p>14 <b>A. Yes, I was, sir.</b></p> <p>15 Q. From what time was that?</p> <p>16 <b>A. Well, it was a CTSFO, sir, and that was from 2011.</b></p> <p>17 Q. Had you undertaken that training within the MPS?</p> <p>18 <b>A. Yes, I did.</b></p> <p>19 Q. Had you undertaken MASTS training?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. When had you become qualified in the MASTS tactic?</p> <p>22 <b>A. In 2005.</b></p> <p>23 Q. Between 2005 and 2012, had you been deployed on</p> <p>24 operations where the MASTS platform had been used?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 67</p>
<p>1 <b>A. Okay.</b></p> <p>2 Q. Can you then open the bundle that is in front of you and</p> <p>3 look at tab 1. Can you see there should be a witness</p> <p>4 statement, dated 23 March 2017, in your name?</p> <p>5 <b>A. Yes, sir, yes.</b></p> <p>6 Q. Then, if you move to tab 2, you will see somebody else's</p> <p>7 witness statement, which has nothing to do with you.</p> <p>8 Yes?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Ignore that one, but go to tab 2A. There is a witness</p> <p>11 statement dated 17 April 2017.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Which was made earlier this week.</p> <p>14 <b>A. Yes, sir, yes.</b></p> <p>15 Q. Are the contents of those two witness statements true to</p> <p>16 the best of your knowledge and belief?</p> <p>17 <b>A. Yes, they are.</b></p> <p>18 Q. When did you join the police service?</p> <p>19 <b>A. 1996.</b></p> <p>20 Q. I think you are still serving?</p> <p>21 <b>A. Yes, I am.</b></p> <p>22 Q. In what rank?</p> <p>23 <b>A. Inspector.</b></p> <p>24 Q. Has all of your service been within GMP?</p> <p>25 <b>A. Yes, although at the moment I am seconded nationally.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 Q. How many operations do you think that had been,</p> <p>2 approximately?</p> <p>3 <b>A. Approximately 30.</b></p> <p>4 <b>THE CHAIRMAN: 30?</b></p> <p>5 <b>A. 30, yes, sir.</b></p> <p>6 MR BEER: By "deployment", I am meaning an authority had</p> <p>7 been granted by an SFC and officers had been briefed.</p> <p>8 <b>A. That's correct, sir, yes.</b></p> <p>9 Q. Of those 30, had you performed the role of an AFO or had</p> <p>10 you performed any different function?</p> <p>11 <b>A. I performed the role of an AFO and also as a TAC</b></p> <p>12 <b>adviser.</b></p> <p>13 Q. In those 30 or so, how many had involved the</p> <p>14 authorisation for the use of special munitions?</p> <p>15 <b>A. I would say approximately 40 to 50 per cent.</b></p> <p>16 Q. Of the 30 or so deployments, how many had resulted in</p> <p>17 decisive action having been taken?</p> <p>18 <b>A. About 10.</b></p> <p>19 Q. Of those 10, special munitions deployed in what</p> <p>20 proportion?</p> <p>21 <b>A. Probably about 50 to 60 per cent.</b></p> <p>22 Q. So five or six?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. What was your understanding, in March 2012, of the MASTS</p> <p>25 platform?</p> <p style="text-align: center;">Page 68</p>

1 **A. Well, my understanding, sir, of the MASTS platform, at**  
 2 **that time, was that it was a platform from which covert**  
 3 **armed officers could support surveillance teams in**  
 4 **a variety of contingencies to provide tactics and**  
 5 **potentially executive action phase, in other words the**  
 6 **arrest phase, on a covert operation.**  
 7 Q. Was that a common understanding amongst AFOs at that  
 8 time do you think?  
 9 **A. I would say so, yes, sir.**  
 10 Q. And that a belief that the MASTS platform was a tactic  
 11 which was used to conduct strikes on subjects in  
 12 vehicles, that was its raison d'etre or its function,  
 13 that wouldn't be right?  
 14 **A. Not necessarily. I would say that although more often**  
 15 **than not the MASTS platform would provide that tactic,**  
 16 **a vehicle strike tactic, there were a whole host of**  
 17 **other tactics that it could also provide for the TFC and**  
 18 **the operation as a whole.**  
 19 Q. Do you think that would have been a common  
 20 understanding, generally, amongst AFOs in 2012?  
 21 **A. I think they would have understood that generally it was**  
 22 **vehicle strikes but they were ready and prepared to be**  
 23 **able to do a whole host of other tactics.**  
 24 Q. What were your general responsibilities in March 2012,  
 25 as the inspector in charge of the operations team?

Page 69

1 **A. I was the inspector in charge of the team. I had**  
 2 **a number of sergeants, as well, that worked for me and**  
 3 **my general role was to manage the team, manage the**  
 4 **team's effectiveness and, also, at that particular**  
 5 **point, we were also trying to increase the capability of**  
 6 **the team in relation to the London Olympics and the**  
 7 **broader CTSFO network nationally.**  
 8 Q. Were you responsible for the provision of training to  
 9 your officers?  
 10 **A. No, I was not specifically responsible for the provision**  
 11 **of the training, that would have been the firearms**  
 12 **Training Unit.**  
 13 Q. How was, in general terms, firearms training organised  
 14 and managed?  
 15 **A. It was organised and managed by a separate team that**  
 16 **worked at Claytonbrook. There would be the chief**  
 17 **firearms instructor, who was in charge of that team,**  
 18 **with a firearms training manager that supported him or**  
 19 **her, and they would have a series of instructors that**  
 20 **would help to provide training for all of the AFOs in**  
 21 **Greater Manchester.**  
 22 Q. Was there a training cycle?  
 23 **A. Yes, sir.**  
 24 Q. How was that arranged, the training cycle?  
 25 **A. My understanding was, sir, that it was arranged**

Page 70

1 **around -- annually, you would have refresher training**  
 2 **that you would have to undertake to be able to keep up**  
 3 **your competency and your accreditation in the role**  
 4 **profiles that you were trained in.**  
 5 Q. So there was annual accreditation?  
 6 **A. Yes, sir.**  
 7 Q. From what date or month did that run from or to?  
 8 **A. My understanding, sir -- bearing in mind I was not**  
 9 **actually a firearms instructor at the time and that was**  
 10 **not my unit -- but my understanding was you would be**  
 11 **trained in one year, and then the senior officer in the**  
 12 **force responsible for firearms would sign you off at the**  
 13 **end of that year to be accredited for the following**  
 14 **year.**  
 15 Q. What about the training that you conducted in the year  
 16 for which you were accredited?  
 17 **A. Well, that training would be refresher training that**  
 18 **would then obviously work in that similar cycle for the**  
 19 **following years to follow.**  
 20 Q. Did your performance on that training, following your  
 21 accreditation, affect in any way your existing  
 22 accreditation?  
 23 **A. Only if it was indicated during that training that you**  
 24 **had done something which would cause a great deal of**  
 25 **concern and require that the instructors would question**

Page 71

1 **your credibility or your competency in that role.**  
 2 Q. Was that process, that you have just described, written  
 3 down anywhere, so far as you are aware?  
 4 **A. I don't know, sir.**  
 5 Q. So, training that you did in the current year didn't  
 6 positively contribute to your occupational or  
 7 operational competence; it is only if there was some  
 8 serious or significant error or failure that it might  
 9 affect your existing accreditation?  
 10 **A. In terms of the process for being accredited, then the**  
 11 **answer would be no. But, in terms of your professional**  
 12 **development, your continued professional development,**  
 13 **then I would argue that it did assist you with your role**  
 14 **because it was giving you extra training and extra**  
 15 **refreshing in terms of your tactics. But, in terms of**  
 16 **the process of being accredited, then it didn't**  
 17 **necessarily. Unless, of course, urgent training was**  
 18 **brought in during the year because of an urgent threat**  
 19 **and risk and we had to do something that was -- and that**  
 20 **had happened in the past, where we were required to do**  
 21 **extra training in certain areas to bring us up to speed**  
 22 **for a specific threat and risk.**  
 23 Q. You told us that the body responsible for training and  
 24 for arranging training was the FTU, not the TFU?  
 25 **A. Yes, that's correct.**

Page 72

1 Q. We heard from Inspector Marcus Williams earlier in the  
 2 week was that the reasons for that would include to  
 3 ensure that officers weren't overstepping the number of  
 4 contact hours that they were supposed to have for  
 5 training, would that be one reason for that approach?  
 6 **A. My understanding would be that it was perhaps looking**  
 7 **the other way, that they didn't do -- that they didn't**  
 8 **do fewer hours than they were supposed to do and,**  
 9 **therefore, they would be able -- they wouldn't have**  
 10 **achieved the actual role profile, but in fewer hours.**  
 11 Q. He said:  
 12 "An additional reason would be to ensure that the  
 13 training that they were doing was relevant and required  
 14 in the role profile that had been authorised by the  
 15 CFI."  
 16 **A. Yes.**  
 17 Q. He said:  
 18 "It would be to ensure that the training was  
 19 necessary and relevant to the policing area."  
 20 He gave the example there is no point training  
 21 somebody to jump out of helicopters if you don't have  
 22 helicopters in the area.  
 23 **A. Yes, and that would be the firearms strategic threat and**  
 24 **risk assessment for that force area, yes.**  
 25 Q. He said that it would be to ensure the training that was

Page 73

1 delivered was safe.  
 2 **A. Yes.**  
 3 Q. Did you nonetheless arrange training for some of your  
 4 officers in the MPS area?  
 5 **A. I was involved in that process, yes, sir.**  
 6 Q. Did that cause, your involvement in that process,  
 7 an issue with Inspector Marcus Williams?  
 8 **A. Not that I am aware of, sir.**  
 9 Q. He told the chairman that he challenged you about it on  
 10 a number of occasions and you said words to the effect  
 11 of, "I've to get GMP match ready for the Olympics", and  
 12 he challenged you and you said, "I don't take orders  
 13 from inspectors". Did that happen?  
 14 **A. I don't remember that conversation, sir. That is not**  
 15 **the kind of language I would have used with a fellow**  
 16 **officer and certainly not another inspector.**  
 17 **However, I did have my portfolio and my portfolio**  
 18 **was to get the team match fit and, obviously,**  
 19 **Mr Williams had his area of business, and I do believe**  
 20 **that Mr Williams would have been aware of that process**  
 21 **because millions of pounds were being put into Greater**  
 22 **Manchester Police and with other large metropolitan**  
 23 **forces to make sure we had all these officers trained.**  
 24 **There was a government structure around that, which**  
 25 **meant we would have regular meetings with our colleagues**

Page 74

1 **from other forces to manage this process, and the CFI,**  
 2 **the operational lead inspector, which was myself, and**  
 3 **also the head of the unit, which was Mr Lawler, were all**  
 4 **invited to those meetings, and these started in around**  
 5 **about 2009 and went on for several years. So the**  
 6 **process of training officers in Greater Manchester**  
 7 **Police to become CTSFOs was well known and completely**  
 8 **transparent.**  
 9 Q. He said that it reached such a head that he took the  
 10 issue up with Chief Inspector Lawler. Chief Inspector  
 11 Lawler apologised to him. A note was made in Chief  
 12 Inspector Lawler's daybook which was countersigned by  
 13 Marcus Williams, and Chief Inspector Lawler promised  
 14 that he would take it up with you.  
 15 Were you aware of any of that?  
 16 **A. No, sir. The only thing that I would be aware of would**  
 17 **be the fact that Mr Lawler, as our sort of manager of**  
 18 **that team, would have often had conversations with both**  
 19 **Mr Williams and myself around improving team**  
 20 **communications, but not speaking to me in that way about**  
 21 **an issue with Mr Williams, no.**  
 22 Q. So the friction that Inspector Williams told the  
 23 chairman about two days ago, that didn't happen?  
 24 **A. Not in the way that Mr Williams has described, no, sir.**  
 25 **I don't recognise that as being the level of issue that**

Page 75

1 **Mr Williams has indicated.**  
 2 Q. Have you read his evidence?  
 3 **A. Yes, sir.**  
 4 Q. Did you arrange for, amongst others, X7 and Z15 to  
 5 attend MPS CTSFO courses?  
 6 **A. I can't remember exactly what the mechanism would be for**  
 7 **who arranged that training, but it is feasible that**  
 8 **I might have been in contact with the**  
 9 **Metropolitan Police around the dates.**  
 10 **But, as I said before, it was a team effort. The**  
 11 **CFI, the inspector lead and the Chief Inspector were all**  
 12 **aware of this process and it had been going on for at**  
 13 **least two years.**  
 14 Q. So Inspector Marcus Williams was not excluded from this  
 15 in any way?  
 16 **A. No, sir. And in all the emails that I would have sent**  
 17 **out or received, I would have copied Mr Williams into**  
 18 **those and Mr Lawler.**  
 19 Q. I am going to ask you some more detailed questions about  
 20 this in a moment, but we know that the outcome of X7's  
 21 course was notified to you but not the chief firearms  
 22 instructor after his failure on the course on  
 23 14 February. Do you know why that was?  
 24 **A. I can only assume that it was because I had a personal**  
 25 **relationship with the instructors down in London, having**

Page 76

1 **worked with them pretty closely.**  
 2 Q. The same thing happened with Z15. Is that the same  
 3 answer?  
 4 **A. Yes, sir. Yes.**  
 5 Q. The evidence we have heard so far suggests that ought  
 6 not to have occurred, that the failures ought to have  
 7 been notified immediately to the CFI and the course  
 8 reports given immediately to the CFI. Do you know how  
 9 that came about, that that didn't happen?  
 10 **A. No, sir. I can only say that because I had a rapport**  
 11 **with the Metropolitan instructors that they sent to me**  
 12 **as they sort of -- who they saw as the head of the GMP**  
 13 **sort of contingent that they were dealing with. But, of**  
 14 **course, I recognised exactly what you have just said and**  
 15 **then I would forward them directly to Mr Williams and**  
 16 **say, "This is for you to deal with as CFI".**  
 17 Q. Can I turn to a different topic, please.  
 18 You, I suspect, in your firearms career, had  
 19 attended a number of risk assessment meetings. Is that  
 20 right?  
 21 **A. Yes, that's correct, sir.**  
 22 Q. As part of your evidence, you refer to a report which is  
 23 in tab 3 of the bundle.  
 24 This is a report, dated 5 July 2012, and it responds  
 25 to a request for information received from Mr Molloy,

Page 77

1 deputy director at SOCA, who was assisting the IPCC  
 2 conducting the investigation into Mr Grainger's death.  
 3 **A. Yes, sir.**  
 4 Q. In the third paragraph, you record Mr Molloy has queried  
 5 why information given during the information  
 6 intelligence section of the firearms briefing, on  
 7 2 March, does not include some information which was  
 8 given on previous briefings.  
 9 Then, if you skip on a paragraph, in the paragraph  
 10 we skip you say you are not in a position to answer  
 11 personally, "But I can tell you the process". Then you  
 12 set out the process, you say:  
 13 "During the planning stages of any pre-planned  
 14 firearms operation, a risk assessment and planning  
 15 meeting will take place, where amongst other things the  
 16 information/intelligence will be provided and assessed.  
 17 Those present should be the person providing the  
 18 information/intelligence, normally the sponsor of the  
 19 operation, who is normally the SIO. Secondly, the  
 20 tactical firearms commander; thirdly the tactical  
 21 adviser and, fourthly, other persons including planners,  
 22 intelligence officers, et cetera, may also be present."  
 23 You say:  
 24 "In cases where it is decided to run a firearms  
 25 operation after the risk assessment meeting, a synopsis

Page 78

1 of the relevant information/intelligence will be  
 2 recorded as a form of words to be given to the firearms  
 3 officers during the briefing. The briefing including  
 4 the section on information/intelligence is owned by the  
 5 TFC and will be given by the TFC."  
 6 So, on the basis of what you say there, would you  
 7 agree with this: firstly, this was a known thing at  
 8 2012, the conduct of a meeting called a "risk assessment  
 9 meeting"?  
 10 **A. Yes.**  
 11 Q. If time allowed, it was habitually conducted in person,  
 12 face to face?  
 13 **A. Yes, that would -- I would say that would be the gold**  
 14 **standard, if you had time to do that and it wasn't time**  
 15 **critical.**  
 16 Q. Those present should be the three people that you  
 17 mention plus others if possible?  
 18 **A. That's correct, sir.**  
 19 Q. The people that should be present, included the TA, yes?  
 20 **A. Yes.**  
 21 Q. Why should the TA be present?  
 22 **A. Well, because the tactical adviser would have that**  
 23 **specialist knowledge to be able to advise on tactics**  
 24 **that a tactical firearms commander, who may never have**  
 25 **been an AFO in his or her career, would need to support**

Page 79

1 **them in the decision making and rationale.**  
 2 Q. You talk about a synopsis of the relevant information  
 3 and intelligence being recorded as a form of words, yes?  
 4 **A. Yes.**  
 5 Q. The synopsis of the relevant intelligence would be  
 6 reduced to a form of words and given to the firearms  
 7 officers during the briefing?  
 8 **A. Yes, that's correct.**  
 9 Q. The synopsis put into a form of words would be settled  
 10 at the risk assessment meeting?  
 11 **A. It would be discussed at the risk assessment meeting,**  
 12 **but it would be settled, I would argue, at the point**  
 13 **where the presentation to firearms officers was agreed**  
 14 **and signed off by the TFC, and that could be at a later**  
 15 **stage.**  
 16 Q. The benefit of the synopsis being settled as a form of  
 17 words whilst the sponsor is still present would be as  
 18 follows, wouldn't it: firstly, the sponsor would have  
 19 had the benefit of having worked on the operation for  
 20 days, weeks, perhaps even a month?  
 21 **A. Yes, that's correct.**  
 22 Q. They would be very familiar with the intelligence,  
 23 because they may have been responsible for obtaining it,  
 24 or at least analysing it?  
 25 **A. Yes.**

Page 80

1 Q. The form of words to be given to the firearms officers  
 2 could be, in your words, recorded during the meeting?  
 3 **A. It could be, sir, but a tactical firearms commander is**  
 4 **trained and should be able to create the form of words,**  
 5 **check, verify and sign them off at a later stage. They**  
 6 **wouldn't necessarily need to have the intelligence**  
 7 **officers or the SIO, or members of the investigation**  
 8 **team present to be able to do that.**  
 9 Q. They should have the experience and intelligence to take  
 10 away from the briefing, that they had received from the  
 11 sponsor, the gist of the intelligence; reduce it to  
 12 writing, accurately in a form of words, and then perhaps  
 13 get it signed off by the sponsor before it is presented?  
 14 **A. Well, I would argue, sir, that they wouldn't necessarily**  
 15 **have to have it signed off by the sponsor as a form of**  
 16 **words. They would receive the intelligence, ask all of**  
 17 **the pertinent questions of the investigation team, make**  
 18 **sure they were happy with it and then they could create**  
 19 **the form of words with their training and experience in**  
 20 **relation to any sensitivities and make that sure it was**  
 21 **accurate, et cetera, at a later stage. They wouldn't**  
 22 **necessarily have to do it at that meeting.**  
 23 Q. They wouldn't necessarily do it in the course of the  
 24 meeting and they wouldn't necessarily revert to the  
 25 sponsor before the briefing was delivered to say, "This

Page 81

1 is what it is proposed to say about the intelligence  
 2 case?"  
 3 **A. No, necessarily, sir. They should have the training to**  
 4 **be able to take that information away and do that**  
 5 **without necessarily having to go back to the sponsor.**  
 6 Q. You say here:  
 7 "A synopsis of the intelligence will be recorded as  
 8 a form of words."  
 9 That suggests, does it, that you recognise that care  
 10 should be taken over what was to be included in the form  
 11 of words, what was to be excluded, and that which was  
 12 included, how it was phrased. Do you agree?  
 13 **A. Yes, I do agree with that, sir, yes.**  
 14 Q. That is no doubt because it was realised that it was  
 15 vitally important that the words used to convey  
 16 intelligence to firearms officers must be accurate?  
 17 **A. Yes, it will assist them with their threat assessment,**  
 18 **so it should be accurate.**  
 19 Q. By "assist them with their threat assessment", you mean  
 20 there may come a time when they rely on what they have  
 21 been told in order to contribute to a decision as to  
 22 whether or not to fire their gun?  
 23 **A. Absolutely, to contribute to that decision. There would**  
 24 **be other elements, but yes.**  
 25 Q. We have heard in this case that there was no meeting.

Page 82

1 There was, instead, a phone call that lasted about  
 2 17 minutes between the TFC, Mr Granby, and the sponsor,  
 3 Mr Cousen, that no TA was present, that no form of words  
 4 was agreed, and that instead the firearms planning team  
 5 were left to create the briefing themselves the  
 6 following day, on the Saturday morning, before the 6.00  
 7 briefing; that they cut and pasted a previous version of  
 8 a briefing document from an earlier operation into the  
 9 briefing for that day's operation.  
 10 **A. Okay.**  
 11 Q. Would that be a departure from the norm?  
 12 **A. It would be a departure from the norm, but it may be**  
 13 **justifiable.**  
 14 Q. Had you ever come across that kind of approach before?  
 15 **A. In relatively quick time operations, where people may**  
 16 **not necessarily be geographically placed to be able to**  
 17 **assist in a full meeting and there was time critical**  
 18 **issues, then yes.**  
 19 Q. What about if intelligence was received -- this is in on  
 20 ongoing operation, where a team had been deployed, as  
 21 I think we know, on the Friday. You know the details  
 22 about this case. They had been stood down early on the  
 23 Friday morning. Further intelligence was received, and  
 24 from about 6.00 there was a plan to rebrief, from 6.00  
 25 the following morning. That may not sound as if time

Page 83

1 was so critical that the things that you have described  
 2 as being ordinary or necessary that couldn't have been  
 3 done. Would you agree?  
 4 **A. It is difficult to comment, sir. It depends on a whole**  
 5 **host of issues, such as the welfare of the team,**  
 6 **et cetera. So it is difficult for me to say, unless**  
 7 **I had all the information in front of me to make**  
 8 **a reasoned judgment on that.**  
 9 Q. How common was it for a form of words to be agreed at or  
 10 after a meeting, a physical meeting?  
 11 **A. It was common for the tactical firearms commander, in**  
 12 **conjunction with planners, the operational firearms**  
 13 **commander and the TAC adviser in my experience, just**  
 14 **prior to the briefing, to check the form of words, to**  
 15 **check the information/intelligence and then, as it were,**  
 16 **sign it off. So it was good to go for the actual**  
 17 **presentation meeting.**  
 18 Q. Check it with whom?  
 19 **A. Check it with the TFC against the TAC adviser and the**  
 20 **OFC. And if the intelligence team and the planners were**  
 21 **there, then they would check with them, but not**  
 22 **necessarily.**  
 23 Q. At the moment I am not following who was checking with  
 24 whom?  
 25 **A. Well, the TFC owns the information/intelligence and the**

Page 84

1 form of words, so he or she would be the person that  
 2 would ultimately agree them. So he or she would be  
 3 checking them with the support network around them,  
 4 which would be the TAC adviser, the operational firearms  
 5 commander and any other planners that had been involved  
 6 in the process.  
 7 Q. The TFC would be checking with the TAC adviser that the  
 8 intelligence and information section of the briefing was  
 9 accurate?  
 10 A. Yes, but ultimately the TFC owned it.  
 11 Q. Yes. So how would the TAC adviser know whether the  
 12 intelligence/information was accurate or not?  
 13 A. He or she would be one of several people, but they would  
 14 potentially have been involved in the risk assessment  
 15 meeting.  
 16 Q. I just want to deal with them in turn, if I can.  
 17 A. Okay.  
 18 Q. The TAC adviser, how would they know whether the  
 19 intelligence and information section of the briefing was  
 20 accurate?  
 21 A. There would be several reasons. One would be that they  
 22 would have a handover booklet from a previous TAC  
 23 adviser, if there was one, and that they would have read  
 24 up on that.  
 25 Q. Stopping there, if they were an oncoming TAC adviser --

Page 85

1 this isn't a continuing authority case, the earlier  
 2 authority had been rescinded in our case.  
 3 A. Okay.  
 4 Q. You would expect them to access the previous TAC adviser  
 5 book?  
 6 A. Yes, if I was in that role as a TAC adviser, I would  
 7 want to look at the previous TAC adviser's book.  
 8 Q. Because that should have recorded the intelligence that  
 9 had been given for that operation?  
 10 A. Yes, absolutely. Yes.  
 11 Q. We know that, in some of the books, there was a column  
 12 against the section for recording information and  
 13 intelligence that allowed TAC advisers to record the  
 14 intelligence grading in the 5x5 model.  
 15 A. Okay.  
 16 Q. Was that a column that was habitually filled out?  
 17 A. No, not necessarily. I would -- in my role as a TAC  
 18 adviser, I might have made those notes in a different  
 19 booklet, a daybook, et cetera, but I would have made  
 20 reference to the fact that they were recorded elsewhere.  
 21 It could be recorded in that booklet.  
 22 Q. Why would you not use the booklet that had been printed  
 23 for the purpose?  
 24 A. Because it may be that there was such a large amount of  
 25 information that there simply was not enough space, and

Page 86

1 that if you had recorded it and timed and dated when you  
 2 had received that information at a previous meeting,  
 3 then it was potentially duplication to try and transfer  
 4 it on to the booklet. So you could make reference to it  
 5 in the booklet and say that you have recorded it  
 6 elsewhere, but the main reason would be just the volume  
 7 of information and intelligence you had had to record.  
 8 Q. You, I think, were giving that as a reason for not using  
 9 the 5x5 column?  
 10 A. In that particular booklet, but I would always want to  
 11 record what the actual 5x5 ratings were.  
 12 Q. Would that be as a TAC adviser, a key piece of the  
 13 jigsaw for you?  
 14 A. Absolutely.  
 15 Q. Just tell the chairman why.  
 16 A. Because the 5x5 system helps to show which information  
 17 or which intelligence, I should say, can be regarded as  
 18 being more accurate than other pieces of intelligence.  
 19 And, in that sense, I would want to show that I had had  
 20 knowledge and recorded exactly what the 5x5 rating was  
 21 for each piece of intelligence that I was assessing.  
 22 Q. So you have explained why the TAC adviser may contribute  
 23 to the assessment of the accuracy of the briefing sheet  
 24 before it is delivered. You mentioned the OFC as well.  
 25 A. Yes.

Page 87

1 Q. How might the OFC be able to contribute to the accuracy  
 2 of the intelligence briefing section?  
 3 A. Well, again, they would have hopefully been present,  
 4 although they wouldn't necessarily have to be, but they  
 5 may have been present at any risk assessment meetings  
 6 and they may be able to offer a second pair of eyes in  
 7 relation to the suggested form of words. So it is  
 8 a kind of support network that the TFC would have.  
 9 Q. Anyone else?  
 10 A. Potentially some of the operations team planners, that  
 11 had been involved in the risk assessment meeting, would  
 12 offer a further set of eyes just to give that TFC that  
 13 extra support.  
 14 Q. Anyone else?  
 15 A. Potentially, the intelligence team, themselves. Members  
 16 from the investigation team or the intelligence cell  
 17 that had been set up.  
 18 Q. They would be, perhaps, the best people, wouldn't they,  
 19 because they are the originators of the intelligence and  
 20 so may be in the best position to say, "Hold on, you  
 21 have misdescribed something there" or "That is not  
 22 supported" or "That is not as reliable as you have  
 23 suggested"?  
 24 A. Yes, but the TFC, at the risk assessment meeting, when  
 25 they have received the full information/intelligence,

Page 88

1 **they should be able to take that and work with that in**  
 2 **accordance with their training. And they wouldn't**  
 3 **necessarily have to have the intelligence team there,**  
 4 **but I do accept that if the intelligence team were**  
 5 **there, then that might support.**  
 6 Q. Was that a common feature, effectively a quality  
 7 assurance check, a safety check, before the words were  
 8 actually uttered to the AFOs that this checking process  
 9 of that page in particular, the information and  
 10 intelligence section, was done?  
 11 **A. Yes, it was very common, almost -- I would say almost**  
 12 **all the time that the TFC would run through that**  
 13 **briefing and pay particular attention to the**  
 14 **information/intelligence, and other important sections,**  
 15 **but yes.**  
 16 Q. The chairman has heard some evidence already that  
 17 sometimes the PowerPoint would just say,  
 18 "Information/intelligence to be added by sponsor", and  
 19 the first time anyone would hear it would be when it was  
 20 read out, when it was read, when it was spoken in the  
 21 course of the meeting.  
 22 **A. Okay.**  
 23 Q. Did that happen?  
 24 **A. There were occasions where updates, updates on the**  
 25 **information/intelligence, especially for dynamic**

Page 89

1 **operations which were quite fast moving, so you might**  
 2 **expect the latest update from the sponsor.**  
 3 Q. You, in your witness statement, if you turn it up,  
 4 please, your first witness statement, at paragraphs 24  
 5 and 25 --  
 6 **A. Yes, sir.**  
 7 Q. -- I'm moving to X7 now -- are dealing with the time at  
 8 which you were informed that X7 had failed his course in  
 9 the MPS.  
 10 **A. Yes.**  
 11 Q. I think the course was running from 16 January to  
 12 16 March 2012.  
 13 **A. Yes.**  
 14 Q. You say, in 24:  
 15 "At some point I was made aware of the reason for  
 16 X7's failure. I can't remember when, but this would  
 17 have been within a short time of X7 returning from the  
 18 MPS SFO course which I was aware was on or after  
 19 14 February 2012. I also cannot remember by what means  
 20 I was made aware."  
 21 Do you think it would have been by X7 telling you  
 22 that he had failed?  
 23 **A. That is possible, sir, yes.**  
 24 Q. You say:  
 25 "I was made aware of the reasons for X7's failure."

Page 90

1 Would that have been by X7 telling you why he had  
 2 failed?  
 3 **A. It is possible it could have been that, or it could have**  
 4 **been a conversation with one of the Metropolitan**  
 5 **instructors, I can't remember.**  
 6 Q. When, at this time, shortly after 14 February, he had  
 7 failed and had returned to force, were you shown the  
 8 course reports at that time?  
 9 **A. I can't remember, sir. I can't remember, at that point,**  
 10 **exactly when I saw those course report notes.**  
 11 Q. I think you will be aware now that there is an email of  
 12 27 February 2012 relating to Z15, saying he had failed  
 13 the course too and he was, the next day, going to bring  
 14 back his own course notes and X7's course notes.  
 15 **A. Yes.**  
 16 Q. That tends to suggest that they hadn't been delivered to  
 17 you about a fortnight after X7 had failed.  
 18 **A. Yes, that's correct, yes.**  
 19 Q. Would it be important for somebody within GMP to know  
 20 promptly after the failure of X7 on the course the  
 21 reasons why he had failed?  
 22 **A. That would be important, yes, sir.**  
 23 Q. Would the course reports be the way of finding that out?  
 24 **A. Not necessarily, that is one way of finding that out,**  
 25 **but I would be quite happy to take a verbal briefing**

Page 91

1 **from instructors from the course where the officer had**  
 2 **been or, indeed, in certain circumstances, even the**  
 3 **officer themselves.**  
 4 Q. What would be the circumstances where you would be  
 5 prepared to rely on the officer telling you the reasons  
 6 for their own failure?  
 7 **A. Well, if the reason for the failure was something that**  
 8 **I would consider to be quite low down the scale of**  
 9 **threat, then I would be quite happy for that officer to**  
 10 **come into the office and explain it to me and brief it**  
 11 **to me. But, of course, I would want to ultimately back**  
 12 **that up with some more knowledge from the instructors**  
 13 **themselves or a course report.**  
 14 Q. But you would be reliant on the officer's description of  
 15 it being fairly low down the scale?  
 16 **A. Well, I wouldn't expect the officers to lie about it,**  
 17 **sir. So if they were to say to me that they did**  
 18 **actually fail on a certain thing, then I would take it**  
 19 **at face value, that, depending on which course it was or**  
 20 **who the officer was.**  
 21 Q. If we look, please at the email. It is in bundle Y,  
 22 which will be shown to you. It is not in that one,  
 23 Mr Nutter.  
 24 **A. Okay.**  
 25 Q. Y, please. Y/1, I think. Page 122, please.

Page 92

<p>1 Are you at 122?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. I think you can see the email that we were just</p> <p>4 discussing at the foot of the page, 27 February, from</p> <p>5 you. You are down there as J3. To your contact in CO19</p> <p>6 in the Met.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. You say:</p> <p>9 "Thanks for allowing X7 to train on part of the SFO</p> <p>10 course. We will now be holding a case conference on</p> <p>11 X7's future in relation to further CQC and associated</p> <p>12 live fire training. Can you send on any course reports</p> <p>13 that you can directly to the CFI. Inspector</p> <p>14 Marcus Williams copied into this email to enable this</p> <p>15 process to take place as soon as possible."</p> <p>16 So it had been a fortnight on from his failure and</p> <p>17 you were asking for the course reports then.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Wouldn't you have wanted to know before then, to be able</p> <p>20 to hold a case conference on X7's future, exactly what</p> <p>21 the Met were saying about his reasons for failure?</p> <p>22 <b>A. I was comfortable with the fact that there were no</b></p> <p>23 <b>critical issues in relation to X7 and, therefore,</b></p> <p>24 <b>I didn't see that there was a requirement for anything</b></p> <p>25 <b>more urgent than what is detailed in that email there,</b></p> <p style="text-align: center;">Page 93</p>	<p>1 Q. The reply you received from the Met was the same day,</p> <p>2 telling you about Z15, which I am going to come back to</p> <p>3 in a moment.</p> <p>4 <b>A. Okay.</b></p> <p>5 Q. But, in the fourth line of the email above, you say:</p> <p>6 "I will ask him [Z15] to bring all of his feedback</p> <p>7 reports and X7's when he returns to you tomorrow."</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. When Z15 did return the day afterwards, 28 February, did</p> <p>10 he give you X7's course reports?</p> <p>11 <b>A. I can't remember, sir.</b></p> <p>12 Q. We know from evidence, or the chairman knows from</p> <p>13 evidence, that he has heard that about a fortnight</p> <p>14 later, after the death of Mr Grainger,</p> <p>15 Inspector Williams obtained X7's course reports from</p> <p>16 you. He has a note in his daybook to that effect.</p> <p>17 Between 28 February and about a fortnight later, did</p> <p>18 you possess X7's course reports?</p> <p>19 <b>A. I can't remember, sir.</b></p> <p>20 Q. If you had been in possession of them, why were you in</p> <p>21 possession of them, from what you had said about them</p> <p>22 needing to go to Inspector Williams?</p> <p>23 <b>A. If I had been in possession of them? Are you asking me</b></p> <p>24 <b>why –</b></p> <p>25 Q. Yes, why would you be holding on to them?</p> <p style="text-align: center;">Page 95</p>
<p>1 <b>sir.</b></p> <p>2 Q. Why were you comfortable?</p> <p>3 <b>A. Well, there are two factors, one X7, as I said before,</b></p> <p>4 <b>did tell me about his failure on the course and gave</b></p> <p>5 <b>some rationale why. And, also, I've –</b></p> <p>6 Q. What did he tell you?</p> <p>7 <b>A. He told me that he had failed on a CQC element of that</b></p> <p>8 <b>course, that he had not shown competency in that area of</b></p> <p>9 <b>the course.</b></p> <p>10 Q. Sorry, you were moving to a second reason for your</p> <p>11 comfortable position?</p> <p>12 <b>A. Yes, also because, when you send a student on</b></p> <p>13 <b>an external course, to an external provider, if there</b></p> <p>14 <b>were safety critical issues, then they would contact you</b></p> <p>15 <b>urgently and immediately, and that did not take place.</b></p> <p>16 Q. So you, I think, were asking in this email for the</p> <p>17 reports to be sent to Marcus Williams, and why was that?</p> <p>18 <b>A. Because Mr Williams was the CFI and he was in charge of</b></p> <p>19 <b>training.</b></p> <p>20 Q. Therefore it fell to him to convene the case conference,</p> <p>21 is that right, in relation to X7?</p> <p>22 <b>A. Yes, he would make an initial assessment of X7's future</b></p> <p>23 <b>in relation to training, in particular things like his</b></p> <p>24 <b>ability to take -- become a CTSFO, so it was important</b></p> <p>25 <b>that Mr Williams got the reports.</b></p> <p style="text-align: center;">Page 94</p>	<p>1 <b>A. Well, I wasn't aware that I was holding on to them, sir,</b></p> <p>2 <b>so ...</b></p> <p>3 <b>I would have no reason to hold on to them, sir.</b></p> <p>4 Q. No. What we have is a we have an email from a Met</p> <p>5 officer saying, "Z15 tomorrow, on the 28th, is going to</p> <p>6 come back with X7's course reports".</p> <p>7 We have that officer Z15 saying, "Yes, I came back</p> <p>8 with some documents on the 28th".</p> <p>9 Then, a fortnight after that, we have a note in</p> <p>10 Inspector Williams's day book saying he obtained X7's</p> <p>11 course reports from you.</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. You cannot remember whether you had them from the 28th</p> <p>14 for a fortnight?</p> <p>15 <b>A. No, I don't recollect that.</b></p> <p>16 Q. If you had had them for that fortnight, what would be</p> <p>17 the good purpose for having them?</p> <p>18 <b>A. The only good purpose would be to read them myself</b></p> <p>19 <b>before I gave them to Inspector Williams.</b></p> <p>20 Q. Why would you be doing that?</p> <p>21 <b>A. Just from my professional interest in one of the members</b></p> <p>22 <b>of my team, and to assist me in understanding how he had</b></p> <p>23 <b>done on the course.</b></p> <p>24 Q. Now you haven't any recollection, I think, over whether</p> <p>25 or not that is what occurred?</p> <p style="text-align: center;">Page 96</p>



1 **A. No, sir, I can't remember whether that is what occurred**  
 2 **or not.**  
 3 Q. Given you say in this email that a case conference  
 4 needed to be held, why was that not held proximately to  
 5 the failure of X7 on the course, on 14 February?  
 6 **A. I don't know, sir.**  
 7 Q. Did you give any active consideration as to whether or  
 8 not, in the light of the reasons for X7's failure on the  
 9 course, on the 14th, that impacted in any way his  
 10 ability to continue to perform the role of an AFO or,  
 11 indeed, as an OFC?  
 12 **A. I considered that it didn't have an impact on his**  
 13 **ability to carry out those roles.**  
 14 Q. Was that your job or was that the job of  
 15 Inspector Williams?  
 16 **A. Ultimately, that would be the job of Inspector Williams.**  
 17 Q. We know he was not put in possession of the information  
 18 to do that until after the death of Mr Grainger. Why  
 19 was that?  
 20 **A. I don't remember, sir. I can't really answer that**  
 21 **because I can't recollect. There was no -- I can't give**  
 22 **you an answer in relation to why I did or did not do**  
 23 **something, because I can't remember it.**  
 24 Q. If you can look at your second witness statement,  
 25 please, the one at tab 2A.

Page 97

1 **A. Yes.**  
 2 Q. Look at paragraphs 24 to 28, please.  
 3 **A. Yes.**  
 4 Q. You say:  
 5 "I would also add that, in 2012, I had a unique  
 6 position of knowledge and experience which I would argue  
 7 gives my assessment more credibility."  
 8 Why were you a unique person in 2012?  
 9 **A. Simply the point I am making there is that I had had the**  
 10 **benefit of being able to attend the Metropolitan Police**  
 11 **training to become a CTSFO, so I had experience and**  
 12 **knowledge of that type of training and what that**  
 13 **training was made up of. Therefore, I felt that I was**  
 14 **in a position where I could make an assessment of other**  
 15 **people that had been on that training, and some of the**  
 16 **difficulties they may have had in being able to put that**  
 17 **into the context when assessing their competency and**  
 18 **credibility in relation to continuing in any role that**  
 19 **they may have.**  
 20 Q. Had no one else in the force attended that training in  
 21 the way that you had?  
 22 **A. Yes, sir, many officers had, but nobody of the rank of**  
 23 **inspector or above.**  
 24 Q. Which you would argue gives your assessment more  
 25 credibility. More credibility than who?

Page 98

1 **A. More credibility perhaps than people -- not necessarily**  
 2 **more credibility, but it adds credibility compared with**  
 3 **people that had not had the benefit of that training.**  
 4 Q. You say here that you would argue that your unique  
 5 position gave your assessment more credibility. I want  
 6 to know: more credibility than who, by name?  
 7 **A. I mean my assessment more credibility. My personal**  
 8 **assessment was more credible, not more credible than**  
 9 **other people's assessment, sir.**  
 10 Q. You are referring to your position here. You, as  
 11 a person, aren't you?  
 12 **A. Yes, sir.**  
 13 Q. If you look at 27 as well, you say:  
 14 "I believe this gave me further insight and  
 15 knowledge not available to others."  
 16 You are not talking about the credibility of your  
 17 assessment, you are talking about the credibility of  
 18 yourself, aren't you?  
 19 **A. Yes, sir, but I am not undermining other people's**  
 20 **assessment. I am saying I had a privileged position**  
 21 **because of my experience, to be able to make**  
 22 **an assessment which -- with the context that I could put**  
 23 **that assessment in, was perhaps -- gave me some more**  
 24 **kind of context compared to other people's assessment.**  
 25 Q. You are comparing yourself against other people. You

Page 99

1 read 24, 27 and 28 together.  
 2 **A. Yes, sir, and I think it is fair for me to say that**  
 3 **because I had been able to assess that course,**  
 4 **personally, that I felt that that gave me some extra**  
 5 **information that allowed me to make a reasoned judgment.**  
 6 **And other people may not necessarily have had the**  
 7 **benefit of that experience.**  
 8 Q. The other people including Inspector Marcus Williams?  
 9 **A. Yes, Inspector Marcus Williams and others.**  
 10 Q. Who are the others that had a less credible position  
 11 than yours?  
 12 **A. No, sir, I am not saying they had a less credible**  
 13 **position. I am saying this gave me some more**  
 14 **credibility in relation to my assessment, my personal**  
 15 **assessment.**  
 16 Q. Whose assessments were less credible than yours?  
 17 **A. I don't think, sir, that I am trying to say that they**  
 18 **were less credible.**  
 19 Q. Okay, you are saying that you were more credible. We  
 20 will leave it that at.  
 21 Who were the other people in respect of which your  
 22 assessments were more credible?  
 23 **A. Well, it would have been people that were involved in**  
 24 **the process to assess these officers.**  
 25 Q. Who?

Page 100

1 **A. That would be Mr Williams, potentially people that sat**  
 2 **on the panel, Mr Giladi, people that not necessarily had**  
 3 **the experience that I had had.**  
 4 Q. The Superintendent Giladi, yes?  
 5 **A. Yes, that's right.**  
 6 Q. And Chief Inspector Lawler?  
 7 **A. Yes.**  
 8 Q. You say here, in 28:  
 9 "It gave me a clarity of understanding when it came  
 10 to both X7 and Z15's position on their return from the  
 11 MPS, which enabled me to take a balanced and accurate  
 12 view of the situation as a whole."  
 13 Yes?  
 14 **A. Yes.**  
 15 Q. You reduced that balance, that accurate view to writing,  
 16 did you?  
 17 **A. Did I put it into a report, sir, are you asking me or**  
 18 **into an email? Is that what you are saying?**  
 19 Q. Or anything.  
 20 **A. No, sir.**  
 21 Q. Why was that?  
 22 **A. Because when somebody comes back from a course, that**  
 23 **they have failed, it wouldn't be normal for me to have**  
 24 **to write a report about them, unless there was something**  
 25 **I felt was so important that I had to put it on paper**

Page 101

1 **and report upwards. And this was not the case in both**  
 2 **of these situations, as far as I was concerned.**  
 3 Q. But we know that after Mr Grainger died, there was  
 4 an inspection of both X7 and Z15's failure records, or  
 5 the records of their attendance on the course that had  
 6 resulted in failure, conducted independently and  
 7 unrelated to their involvement in the death of  
 8 Mr Grainger. If that wasn't normal, why was that done?  
 9 If it was not normal to convene, effectively, a meeting,  
 10 a panel, to examine reasons for failure, why was that  
 11 done?  
 12 **A. Can I just clarify: I think the panel was in relation to**  
 13 **Z15, not X7. So we are not talking about both officers,**  
 14 **we are talking about Z15. Is that correct, sir?**  
 15 Q. Yes.  
 16 **A. Okay. Well, in relation to Z15, that panel was called**  
 17 **because Mr Williams had concerns, and he raised those**  
 18 **concerns and, therefore, a panel was called.**  
 19 **If the decision-making process had been mine and**  
 20 **only mine, I would not necessarily have called the panel**  
 21 **for Z15. That would have been my personal opinion.**  
 22 Q. You would have done what you told the chairman there,  
 23 you would have thought about it. But not necessarily  
 24 reduced anything to writing whether by email or report?  
 25 **A. No, because I felt with the information that I'd had**

Page 102

1 **from both that officer and from the Metropolitan Police,**  
 2 **and the actions that the Metropolitan Police took in**  
 3 **relation to offering him a second course, I didn't feel**  
 4 **it was a safety critical issue and I felt the officer**  
 5 **would be able to carry out his duties without having to**  
 6 **go to a panel to review his position.**  
 7 Q. So is this where the crunch comes between you and  
 8 Mr Williams; his email of 15 March, where he very much  
 9 regarded these as safety critical issues? He made  
 10 a long list of them and said, "If this was a GMP course,  
 11 the officer would have been effectively stopped at point  
 12 3 and yet he went on to commit extreme breaches 4, 5 and  
 13 6". You fundamentally disagreed with that approach?  
 14 **A. I disagreed with that approach, sir, but I can**  
 15 **understand why Mr Williams would want to assess it. But**  
 16 **I did disagree with the fact that we needed to assess**  
 17 **Z15 at that level and, of course, the panel did find**  
 18 **that Z15 was credible to carry on as a firearms officer.**  
 19 Q. Yes. Yes, and we will look at that in a moment.  
 20 **A. Okay.**  
 21 Q. Just returning to X7 then. So, on what X7, himself, had  
 22 told you when he returned to GMP, you didn't think it  
 23 was necessary to do anything by way of email writing or  
 24 report writing, or convening a panel?  
 25 **A. No, sir. Many firearms officers fail courses. They**

Page 103

1 **fail courses, they go back, they take them again. It**  
 2 **happens a lot. I would not be writing reports on every**  
 3 **officer that failed a firearms course.**  
 4 Q. If we can take out bundle X, please.  
 5 Look at page 16, please.  
 6 **A. Yes.**  
 7 Q. Thank you. This an email from Inspector Williams to  
 8 Chief Inspector Lawler, copied to you, of 15 March. He  
 9 says:  
 10 "I have reviewed the feedback sheets concerning X7's  
 11 recent failure on the course, culminating with  
 12 a failure. This was his second attempt at the course.  
 13 The second attempt was at the discretion of CFI and was  
 14 based on X7 having shown evidence of development during  
 15 the first course. Having read the feedback reports from  
 16 ... [blank, who was a Met officer] there is evidence to  
 17 show that X7 has failed to develop through the CQC  
 18 element and has consequently failed the summative  
 19 section of the assessment process. This is his second  
 20 failure in this tactic and, as such, he is now  
 21 designated no further training in this tactic. As  
 22 discussed with Inspector Nutter, I am content to step  
 23 outside the SOP and let X7 be notified of the decision  
 24 by yourselves."  
 25 Why was that, the stepping outside of the SOP?

Page 104

1 **A. I don't know, sir. I can only assume it was in relation**  
 2 **to -- it would be easier for me, as X7's line manager,**  
 3 **to speak to him personally, but I don't know exactly why**  
 4 **Mr Williams said that.**  
 5 Q. "I feel it is only fair to note that the feedback from  
 6 the MPS shows that X7 has worked very hard during the  
 7 course and failure is in no way from any lack of effort  
 8 or enthusiasm on his part. I would also add, however,  
 9 that, from reading the feedback, my interpretation is  
 10 that X7 has become overloaded when under pressure and  
 11 this has had an effect on his decision-making process."  
 12 Did you agree with that?  
 13 **A. No, I don't think I did agree with that, to be honest,**  
 14 **sir.**  
 15 Q. Now, the function of deciding this issue, would that  
 16 fall to the FTU or the TFU?  
 17 **A. The issue of whether he was no further training.**  
 18 Q. Yes.  
 19 **A. It would fall to the FTU, to the CFI.**  
 20 Q. So it was Inspector Williams's decision and not yours?  
 21 **A. Yes.**  
 22 Q. Then, if we go back a page, to page 15, Chief Inspector  
 23 Lawler replies:  
 24 "Marcus, thank you for the prompt review of X7's  
 25 performance in the Met and how this affects him in the

Page 105

1 GMP. He is non-operational because he is a principal.  
 2 Myself and you will deal with this matter as there are  
 3 a number of different issues in relation to X7 which  
 4 need to be dealt with."  
 5 What were the number of different issues in relation  
 6 to X7 that needed to be dealt with?  
 7 **A. They were generally in relation to X7's career and his**  
 8 **welfare. His future career, his position on the**  
 9 **operations team as one of my sergeants, those kinds of**  
 10 **points that we needed to sort of delicately address with**  
 11 **X7, especially in light of the fact that he had been**  
 12 **involved in the death of Mr Grainger.**  
 13 Q. So this was a mix of the consequences of the failure on  
 14 the course for his future viability as a member of the  
 15 operations team and his involvement in the death of  
 16 Mr Grainger?  
 17 **A. Well, yes. The involvement with the death of**  
 18 **Mr Grainger was just in relation to his welfare.**  
 19 **I wanted to tread carefully. I didn't want somebody who**  
 20 **had had the bad news of perhaps his career being**  
 21 **thwarted in the operations team to be dealt with any**  
 22 **more robustly than it had to be in relation to the fact**  
 23 **that he was also a principal officer and may have some**  
 24 **welfare issues.**  
 25 Q. So is what happened to X7 that he was moved on to an ARV

Page 106

1 team?  
 2 **A. Yes, a discussion took place, and I told X7 that now his**  
 3 **future on the operations team was limited, he didn't**  
 4 **have to move straight away but, ultimately, because he**  
 5 **could never become a CTSSFO, his future on had a team was**  
 6 **limited and he agreed that the best place for him to go**  
 7 **would be an ARV team.**  
 8 Q. Can I turn to Z15 then, please.  
 9 If we go back to bundle Y, at page 122?  
 10 **A. Yes.**  
 11 Q. The email in blue, second down, the Met officer says:  
 12 "Inspector Nutter, unfortunately, I have more  
 13 developments for you on the GMP student front. Today  
 14 I have asked Z15 to leave the course for safety issues,  
 15 during cover and movement. He has been fully debriefed  
 16 on these issues. I will ask him to bring all of his  
 17 feedback reports."  
 18 We have read that passage:  
 19 "If we are in a position, I will offer Z15 a second  
 20 course which will be in November of this year. Sorry to  
 21 pass on more bad news. Any questions re this, please  
 22 contact me."  
 23 Would you be concerned on reading this email that  
 24 one of your officers had left the course early for  
 25 safety reasons?

Page 107

1 **A. Not necessarily, sir, because we are looking at the**  
 2 **email. The instructor from the Metropolitan Police has**  
 3 **said he has been fully debriefed on these issues, and**  
 4 **then further down, he says "I would like to offer him**  
 5 **a second course". As soon as I read that, I understood**  
 6 **that, obviously, it is quite common with the higher**  
 7 **level of training, especially live fire training, and,**  
 8 **in particular, the cover and movement training, that has**  
 9 **been referred to, it is quite common for very good**  
 10 **officers to make mistakes which could be safety issues**  
 11 **but, as long as they are debriefed properly, and the**  
 12 **fact that he is offered a course in the near future,**  
 13 **I had no concerns.**  
 14 Q. No concerns. So the important thing to take from the  
 15 email, from your perspective, was the second course, not  
 16 that he had been failed on safety issues?  
 17 **A. Well, the second course indicates to me that those**  
 18 **safety issues were not at a level that would cause me**  
 19 **any great concern.**  
 20 Q. So you would no doubt want to get hold of the course  
 21 notes as soon as possible to see exactly what the safety  
 22 issues were?  
 23 **A. I did speak to Z15, and Z15 did tell me what those -- he**  
 24 **talked me through those kinds of issues, and also**  
 25 **I would like to see the course notes, yes.**

Page 108

1 Q. We have heard from Z15, and he says his viewpoint on  
 2 a number of the issues raised by the Met was different  
 3 from the Met itself. He held, subjectively, a different  
 4 view from them.  
 5 **A. Yes.**  
 6 Q. Would you agree that he may not be the best provider of  
 7 objective information as to the reasons for his failure?  
 8 **A. Yes, he would be one person that I would get information**  
 9 **from, but I accept what you are saying, that he would**  
 10 **not necessarily be best provider.**  
 11 Q. So you would want to get access to the course notes as  
 12 soon as possible?  
 13 **A. I would want to see the course notes, sir, but I would**  
 14 **not necessarily want see them as soon as possible,**  
 15 **because I was quite content with what I could see there,**  
 16 **that there were no safety critical issues.**  
 17 Q. When he examined the course notes, Inspector Williams  
 18 found that there were six safety critical issues and  
 19 said that some of them were potentially life threatening  
 20 incidents that raised issues as to Z15's future to be  
 21 an AFO at all. That if he had found out about these  
 22 course notes before 3 March, Z15's authority would  
 23 probably have been suspended and he wouldn't have taken  
 24 part in the operation, on 3 March. Do you take the same  
 25 position?

Page 109

1 **A. No, I don't, sir. No.**  
 2 Q. Why not?  
 3 **A. Because, going back to the point in my statement around**  
 4 **my understanding of the course, and the context of the**  
 5 **course, having been on that training and having done the**  
 6 **cover and movement, I understood that an officer in that**  
 7 **kind of environment could make mistakes which would not**  
 8 **necessarily mean, and would often not mean, that they**  
 9 **had safety critical issues and were not competent to**  
 10 **carry out operations back in their own force, for the**  
 11 **tactics they were trained and accredited in. That was**  
 12 **my viewpoint.**  
 13 Q. That is why your view has more credibility than that of  
 14 Mr Williams?  
 15 **A. No, that is why I feel that I have more credibility in**  
 16 **making that assessment, personally, because I have been**  
 17 **down to that course.**  
 18 Q. And that is why you were in a unique position; you have  
 19 further insights not available to others; you have  
 20 knowledge not available to others; you had a clarity of  
 21 understanding that enabled you to take a balanced and  
 22 accurate view. Is that right?  
 23 **A. I felt that did assist me in making my decision. Yes,**  
 24 **sir.**  
 25 Q. The decision actually fell, did it not, to the CFI, not

Page 110

1 to you?  
 2 **A. Yes.**  
 3 Q. But by not being provided with the course notes, the CFI  
 4 can't take the decision before 3 March, could he?  
 5 **A. No, sir.**  
 6 Q. Why wasn't he provided the course notes before 3 March?  
 7 **A. I think I previously said, sir, I can't remember in**  
 8 **relation to that, so I still can't remember now.**  
 9 Q. You had an email, of the 27th, saying that Z15 is going  
 10 to bring the course notes back with him the next day.  
 11 The chairman has heard evidence from Z15 that he  
 12 remembers bringing documents, sitting down at Openshaw  
 13 and reading them the next day, on 28th, when he had  
 14 driven back to Greater Manchester. Did he give them to  
 15 you?  
 16 **A. I can't remember, sir. He may have done, but I can't**  
 17 **remember.**  
 18 Q. We know, again, that Inspector Williams was  
 19 subsequently, about a fortnight later, to get the notes  
 20 from you.  
 21 If he was given the notes by you, from whom did you  
 22 get them?  
 23 **A. Sir, I can't remember that period, so I can't say**  
 24 **whether I had the notes or whether I gave them to**  
 25 **Mr Williams because I can't remember exactly what the**

Page 111

1 **mechanisms were for Mr Williams getting those notes.**  
 2 Q. Can we turn, please, to X, at page 20.  
 3 **A. Yes, sir.**  
 4 Q. This is after reading the course notes.  
 5 Inspector Williams's considered view on the consequences  
 6 for Z15's failures, yes?  
 7 **A. Yes.**  
 8 Q. Did you ever respond to this in writing to say the kind  
 9 of things that you have said in your witness statements  
 10 to the chairman about credibility, uniqueness of  
 11 position, insights not available to others?  
 12 **A. Not to my knowledge, sir, no.**  
 13 Q. Did you attend the panel?  
 14 **A. Yes, sir.**  
 15 Q. From your recollection, what was it, in the light of  
 16 this email here and the Chief Firearms Instructor's  
 17 views set out here, that carried the day that allowed  
 18 Z15 to carry on as an AFO?  
 19 **A. From recollection, sir, it would be the fact that Z15**  
 20 **gave some rational for his understanding of what**  
 21 **happened and, also, I think the fact that it was argued**  
 22 **that Z15 was the kind of person that was – take perhaps**  
 23 **a little bit longer to learn and develop, especially at**  
 24 **the higher end of the course and the skills that were**  
 25 **required, but he had a track record of showing that he**

Page 112

<p>1 <b>would actually achieve that level given the opportunity</b></p> <p>2 <b>and the time.</b></p> <p>3 Q. Such was the strength of that view, not even a safety</p> <p>4 warning, a basic safety warning was recorded against</p> <p>5 Z15's name, was it?</p> <p>6 <b>A. No, sir.</b></p> <p>7 Q. Why was that?</p> <p>8 <b>A. I don't know, sir, you would have --</b></p> <p>9 Q. The chief firearms instructor had said that this man had</p> <p>10 engaged in a potentially life-threatening incident, that</p> <p>11 there were six safety breaches and his conduct called</p> <p>12 into question his ability to be an AFO at all. Why was</p> <p>13 not even a basic safety warning recorded against his</p> <p>14 record?</p> <p>15 <b>A. Well, the first point I would make, sir, is that</b></p> <p>16 <b>I didn't necessarily agree with that. That is</b></p> <p>17 <b>Mr Williams's viewpoint.</b></p> <p>18 <b>So, in relation to -- after Mr Williams has made</b></p> <p>19 <b>those comments why it didn't result in even a safety</b></p> <p>20 <b>warning, I think you would really have to ask</b></p> <p>21 <b>Mr Williams. I put my viewpoint forward on the panel,</b></p> <p>22 <b>that I felt Z15 should be given another chance, that</b></p> <p>23 <b>that was his style of learning and that potentially</b></p> <p>24 <b>Z15 -- the actions that he had taken on Z15's</b></p> <p>25 <b>description of events were not as bad, if you like, as</b></p> <p style="text-align: center;">Page 113</p>	<p>1 <b>A. Yes, I was told which officer had fired a weapon.</b></p> <p>2 Q. Were you told why?</p> <p>3 <b>A. No, sir.</b></p> <p>4 Q. Were you told that no weapon had been recovered from the</p> <p>5 subject vehicle?</p> <p>6 <b>A. No, sir.</b></p> <p>7 Q. What other conversation was there then between you and</p> <p>8 the other members of the team?</p> <p>9 <b>A. The conversations were purely around welfare, how they</b></p> <p>10 <b>were feeling, but there was no discussion of the actual</b></p> <p>11 <b>operation or the job itself.</b></p> <p>12 Q. Why was that?</p> <p>13 <b>A. Because that would have been improper in relation to the</b></p> <p>14 <b>post-incident procedures, where we -- I would have</b></p> <p>15 <b>wanted the team not to confer with each other, not to</b></p> <p>16 <b>discuss anything that may have happened, especially with</b></p> <p>17 <b>somebody that had not been involved in the operation.</b></p> <p>18 Q. What subsequent involvement did you have in the process</p> <p>19 of accounts being recorded from any of the 16 officers</p> <p>20 involved in the operation?</p> <p>21 <b>A. I wasn't involved in that process whatsoever, sir.</b></p> <p>22 Q. We know that they came, bar three officers that made</p> <p>23 initial accounts on the night, to make witness</p> <p>24 statements on 9 March, the following Friday. Were you</p> <p>25 involved in any way in arrangements being made for the</p> <p style="text-align: center;">Page 115</p>
<p>1 <b>had been described. But in relation to why, ultimately,</b></p> <p>2 <b>that viewpoint was changed and there was no safety</b></p> <p>3 <b>warnings, that would not necessarily be my position to</b></p> <p>4 <b>make that decision. I would give advice at the panel,</b></p> <p>5 <b>in my position, but I wouldn't be the decision maker.</b></p> <p>6 <b>So it is difficult for me to answer that question.</b></p> <p>7 Q. Can I turn lastly to a separate topic. Were you on duty</p> <p>8 on 3 March 2012?</p> <p>9 <b>A. No, sir.</b></p> <p>10 Q. When did you next come on duty after that time?</p> <p>11 <b>A. Well, actually, correction, sir: I was not on duty on</b></p> <p>12 <b>3 March, but I did attend the PIP process after the</b></p> <p>13 <b>shooting, and I was called in off leave by a member of</b></p> <p>14 <b>my team. One of my sergeants rang me and I came in to</b></p> <p>15 <b>assist with the welfare of the team.</b></p> <p>16 Q. Where did you go?</p> <p>17 <b>A. To Claytonbrook.</b></p> <p>18 Q. Were all of your team gathered together?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. In Claytonbrook?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. Did you ask what had happened?</p> <p>23 <b>A. No, sir. Beyond the obvious thing, that there had been</b></p> <p>24 <b>a fatal shooting.</b></p> <p>25 Q. Did you find out who had fired a gun?</p> <p style="text-align: center;">Page 114</p>	<p>1 statements to be taken on that day?</p> <p>2 <b>A. No, sir.</b></p> <p>3 Q. Were you involved in any way in negotiations as they</p> <p>4 have been described, between GMP and the IPCC over the</p> <p>5 format in which witness statements or accounts were to</p> <p>6 be provided?</p> <p>7 <b>A. Not to my recollection, sir, no.</b></p> <p>8 Q. Did you attend a meeting on 8 March 2012, the Thursday,</p> <p>9 when members of the PFOA attended GMP?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. What was the purpose of that meeting?</p> <p>12 <b>A. The PFOA are a charitable organisation and it was</b></p> <p>13 <b>a welfare visit because, obviously, these tragic events</b></p> <p>14 <b>don't happen very often and they represent firearms</b></p> <p>15 <b>officers around the whole country, and they came to</b></p> <p>16 <b>visit the team on a welfare visit.</b></p> <p>17 Q. Do you know why they had brought V53 with them?</p> <p>18 <b>A. For the same reasons, sir, because that officer had been</b></p> <p>19 <b>through similar circumstances and it was to allow that</b></p> <p>20 <b>officer to speak to the team and explain the kinds of</b></p> <p>21 <b>emotions and thoughts, I think, that we would be going</b></p> <p>22 <b>through, and to reassure us in relation to those kinds</b></p> <p>23 <b>of emotions and pressures that we may have been feeling.</b></p> <p>24 Q. This was at a time when the majority of those present</p> <p>25 had not written down what had happened when a member of</p> <p style="text-align: center;">Page 116</p>

1 the public had been killed?  
 2 **A. Yes, sir.**  
 3 Q. Was a record kept of the meeting?  
 4 **A. Not that I am aware of, sir. It may have been, but**  
 5 **I don't know.**  
 6 Q. Were you the most senior officer present?  
 7 **A. From recollection, sir, I don't know. It may have been**  
 8 **one of the professional standard branch officers who may**  
 9 **have been a detective chief inspector.**  
 10 Q. Were you present on 9 March when witness statements were  
 11 being taken in a room collectively?  
 12 **A. No, sir.**  
 13 Q. Did you have any part in the taking of witness  
 14 statements?  
 15 **A. No, sir.**  
 16 MR BEER: Thank you very much.  
 17 **A. Thank you.**  
 18 MR THOMAS: Sir, I know we haven't had a break but I'm not  
 19 going to be very long. It is up to you. Let's take  
 20 stock.  
 21 THE CHAIRMAN: Can you give me a rough idea?  
 22 MR THOMAS: I think I will be no more ten minutes, tops.  
 23 THE CHAIRMAN: Does anybody else have questions?  
 24 MR WEATHERBY: Yes, I will be about ten minutes.  
 25 THE CHAIRMAN: I think we had better take a break, because

Page 117

1 we have been going now for about an hour and 20 minutes.  
 2 We will take five minutes.  
 3 (3.09 pm)  
 4 (A short adjournment)  
 5 (3.15 pm)  
 6 Questions from MR THOMAS  
 7 MR THOMAS: Mr Nutter, my name is Mr Thomas and I am  
 8 representing Anthony's family, okay?  
 9 **A. Okay.**  
 10 Q. I have a few questions for you, not very many.  
 11 Can I start where Mr Beer left off, in relation to  
 12 your attendance at Claytonbrook, on 3 March.  
 13 **A. Yes.**  
 14 Q. Okay.  
 15 Now, you just said that you would not want the team  
 16 to be discussing the incident with somebody who was not  
 17 involved in an operation for obvious reasons, yes?  
 18 **A. Yes, sir.**  
 19 Q. Right. That would also include the post-incident  
 20 procedure, would it not?  
 21 **A. Sorry, just repeat the question, sir.**  
 22 Q. Yes. Your team, in terms of the post-incident  
 23 procedure, that is clearly set out, correct?  
 24 **A. Yes, sir.**  
 25 Q. All right. There was a post-incident manager there. So

Page 118

1 if any member of your team was unclear or unsure as to  
 2 what to do, they could always refer to the post-incident  
 3 manager?  
 4 **A. Yes, sir.**  
 5 Q. Right. So when you said earlier on you would not want  
 6 your team discussing the incident with somebody not  
 7 involved in the operation, my question to you is: that  
 8 would also include the post-incident procedure, would it  
 9 not? Because if they have the post-incident manager  
 10 there, they could be discussing anything that they are  
 11 unclear of with that individual?  
 12 **A. Yes, and I would expect them to be able to speak to the**  
 13 **post-incident manager and his or her team for any of**  
 14 **those issues, or people supporting that team.**  
 15 Q. Yes, of course, I include that.  
 16 **A. Yes.**  
 17 Q. All right.  
 18 Now, you were at the meeting, which took place with  
 19 the Firearms Association on --  
 20 **A. Yes.**  
 21 Q. I believe it was the 5th?  
 22 The 8th, forgive me, 8 March. Mr Beer has just  
 23 asked you about that and you said that welfare was being  
 24 discussed. But there was more than just welfare being  
 25 discussed with V53. We have heard evidence in this

Page 119

1 Inquiry that there was discussion at that meeting in  
 2 relation to failures by your team to have completed  
 3 their first accounts. That was being discussed.  
 4 **A. Yes, they were surprised that the team -- their view was**  
 5 **that perhaps the team should be given the opportunity**  
 6 **to --**  
 7 Q. All right, help me with this, because I am having real  
 8 trouble understanding --  
 9 THE CHAIRMAN: Sorry to interrupt, but I just want to make  
 10 sure because you were not allowed to complete the  
 11 sentence. They were surprised that the team had not  
 12 made statements, hadn't given accounts?  
 13 **A. Their view was that the accounts should have been made**  
 14 **sooner. Yes, sir.**  
 15 THE CHAIRMAN: Sorry, yes.  
 16 MR THOMAS: So this is what I am struggling to understand.  
 17 How did that come up in this meeting? If the firearms  
 18 association and V53 were there, only discussing welfare,  
 19 this is not a welfare topic, how did this come about,  
 20 because there are no minutes of this meeting?  
 21 **A. Well, I would argue that it was connected to welfare,**  
 22 **that topic.**  
 23 Q. Well, okay, so my question remains: how did this come  
 24 up?  
 25 **A. Because that topic, I would argue, was related to**

Page 120

1 welfare issues, in the sense that --  
 2 Q. Who raised it?  
 3 **A. I can't remember exactly who raised the topic first,**  
 4 **sir.**  
 5 Q. What was the context in which it was raised?  
 6 **A. I think it was the welfare of the officers, sir.**  
 7 Q. So somebody was saying, "We haven't made our statements  
 8 yet, what have you got to say about that?", something  
 9 like that?  
 10 **A. Well, the officers received training in relation to**  
 11 **post-incident procedures, and one of the areas in**  
 12 **relation to post-incident procedures, which is well**  
 13 **documented and which officers will be aware of, is the**  
 14 **fact that there are certain periods of time when your**  
 15 **recollection of events will either be better or worse**  
 16 **depending on when it occurs. And that I think the**  
 17 **argument was that -- from a welfare point of view of**  
 18 **being able to get that opportunity to be able to give**  
 19 **an open and transparent and truthful account, as quickly**  
 20 **as possible within those timescales -- we should be**  
 21 **looking at when we are deal with this. I think the PFOA**  
 22 **quite professionally said, "Well, you might want to have**  
 23 **a look at this, because our view is you might want to do**  
 24 **this sooner rather than later".**  
 25 Q. The actual post-incident procedure is very clear, that

Page 121

1 account should be done within 48 hours, or thereabouts.  
 2 **A. Yes, but I think it allows for a longer time as well, in**  
 3 **certain circumstances.**  
 4 Q. I am talking about -- certainly, the first account  
 5 should have been given on the night.  
 6 **A. The stage 3 account?**  
 7 Q. Yes.  
 8 **A. Yes, the stage 3 account could be given on the night.**  
 9 **Yes, sir.**  
 10 Q. You would accept it would be improper if the way  
 11 statements were -- and I am talking about the contents  
 12 of statements -- formulated, it would be fairly improper  
 13 for that to be influenced by outsiders?  
 14 And when I say "outsiders", I am talking about  
 15 people unrelated to this operation, people not part of  
 16 it.  
 17 **A. In this context, I don't necessarily agree with that,**  
 18 **sir, and I will explain why. Because I believe the PFOA**  
 19 **have a responsibility for the welfare of the officers,**  
 20 **and I feel that if they felt that this was good advice**  
 21 **in relation to the wider welfare. And, also, they would**  
 22 **understand that they have a duty in relation to the fact**  
 23 **that we have a process that we should adhere to and that**  
 24 **we are bound to provide a truthful account of what**  
 25 **happened and, therefore, I think they would give advice**

Page 122

1 **for both those reasons, to assist GMP.**  
 2 Q. But Mr Nutter, I don't even have to get into  
 3 truthfulness or untruthfulness. The very fact that,  
 4 before you have given your account, you are being  
 5 influenced by what somebody unrelated to the incident  
 6 says to you, your account may be unconsciously tainted.  
 7 Do you not see that?  
 8 **A. No, I see that they are talking about timescales as**  
 9 **opposed to content.**  
 10 Q. All right.  
 11 Was Mr Cousen there, at this meeting?  
 12 **A. Not that I remember, sir.**  
 13 Q. Because, can I just use Mr Cousen just by way of  
 14 an example. He is somebody who obviously should have  
 15 given an account. You accept that because he was your  
 16 officer in the case?  
 17 **A. He should have given an account at the post-incident**  
 18 **procedures?**  
 19 Q. He is somebody who should have given an account because,  
 20 being the officer in the case, his evidence was relevant  
 21 to what took place that night. An early account. Do  
 22 you accept that?  
 23 **A. In relation to the post-incident procedures, sir?**  
 24 Q. No, in relation to what happened.  
 25 **A. Yes, sir, I suppose that would be relevant. Yes, sir.**

Page 123

1 Q. Right. Now, we know, because we have seen the emails --  
 2 and I am not going to pull them up now -- that Mr Cousen  
 3 was contacting the officer in the case in the Duggan,  
 4 before he did his statement.  
 5 **A. Mr Cousen as in the SIO?**  
 6 Q. Yes.  
 7 **A. I have no knowledge of that, sir.**  
 8 Q. Let me move on to a different topic. My final topic,  
 9 sir.  
 10 You were, in effect, the line manager for Q9. Is  
 11 that right?  
 12 **A. I was his second line manager. His first line manager**  
 13 **would have been the sergeants.**  
 14 Q. Okay. When Mr Williams gave evidence, just a couple of  
 15 days ago, there were a series of questions I was asking  
 16 him and he said that you would be the better person to  
 17 ask those questions, so I am going to ask you those  
 18 questions now, okay?  
 19 **A. Is that Inspector Williams?**  
 20 Q. Inspector Williams, yes.  
 21 **A. Yes.**  
 22 Q. So, firstly, what is the mechanism if an individual  
 23 firearms officer has a series of complaints against  
 24 them? It may be the complaints are unsubstantiated.  
 25 But there is a series of complaints against the

Page 124

1 individual, what is the mechanism for determining their  
 2 suitability to continue to serve as a firearms officer  
 3 until those complaints are resolved?  
 4 **A. I am not aware of any official mechanism beyond my own**  
 5 **personal observations if they were complaints that**  
 6 **occurred whilst I was his line manager.**  
 7 Q. Were you aware that there were 12 separate complaints  
 8 against Q9 that he had assaulted somebody?  
 9 **A. I was aware that Q9, when he was an officer at**  
 10 **a particular police station, had had a complaint made**  
 11 **against him many years before he came into firearms.**  
 12 Q. Forgive me, it is not just many years before. Can we  
 13 turn up G2, page 1146 to 1148(a).  
 14 I will repeat that, sir, G2/1146 to 1148(a).  
 15 Do you have the document there?  
 16 **A. I have 1148.**  
 17 Q. You should have --  
 18 **A. Yes, 1148 alpha?**  
 19 Q. Yes.  
 20 THE CHAIRMAN: Hang on.  
 21 Yes.  
 22 MR THOMAS: Okay, so I am looking at 1148 alpha, if you  
 23 concentrate on that page just for the time being, yes?  
 24 **A. Yes.**  
 25 Q. Can you see the date on the left-hand side. I am not

Page 125

1 going to take us through all of them, but you can see  
 2 certainly in 2007, "unnecessary force". February 2011,  
 3 15th, "assault on arrest". 21 February 2011, "assault  
 4 on arrest". "Use of Taser, assault on arrest".  
 5 You know, these are all allegations against Q9 in  
 6 relation to his conduct. In a way, I would suggest his  
 7 temperament, yes? So they are not old allegations,  
 8 these were fairly recent allegations against Q9, and you  
 9 can see them there.  
 10 My question: is there any mechanism if somebody has  
 11 a series of complaints which goes to their  
 12 temperament -- I would suggest that allegations,  
 13 particularly a number of allegations, saying that  
 14 somebody assaults on arrest goes to their temperament.  
 15 Is there any mechanism whereby the officer's temperament  
 16 for suitability of being a firearms officer is reviewed?  
 17 **A. Not that I am aware of, sir, but I would argue that you**  
 18 **are basing it on a false premise in the first instance,**  
 19 **because these are not proven. That officer works in**  
 20 **an environment where it is quite likely that people --**  
 21 Q. What? Make falls allegations?  
 22 **A. Yes, that's correct, sir. I believe that to be true.**  
 23 **Yes, sir, because we deal with the higher end of**  
 24 **criminality, so this is nothing unusual to me, sir.**  
 25 Q. Forgive me, I accept that the allegations are unproven.

Page 126

1 But, at the time, if there is a series of allegations  
 2 that are being made, right? There must come a point  
 3 whereby, until the allegation has been investigated, is  
 4 there a mechanism for looking at an individual and  
 5 determining, "Well, hang on a second, should this  
 6 individual still be a firearms officer?"  
 7 **A. The mechanism would be the assessment of line managers**  
 8 **in relation to their suitability in any other way,**  
 9 **including potential allegations of assault or use of**  
 10 **force.**  
 11 Q. So that begs this question then: were you aware of these  
 12 allegations at the time?  
 13 **A. No, because I was not his line manager at this time, so**  
 14 **I was not aware of these allegations, no.**  
 15 Q. Who would have been his immediate line manager?  
 16 **A. At this time, his immediate line manager, sergeant-wise,**  
 17 **I can't say. Even inspector-wise, at these dates,**  
 18 **possibly, possibly, Inspector Fitton, possibly**  
 19 **Inspector Oakes. I can't be certain.**  
 20 MR THOMAS: Sir, that is all I ask.  
 21 THE CHAIRMAN: Mr Weatherby, do you have questions? I think  
 22 you indicated you did.  
 23 MR THOMAS: I do, yes.  
 24  
 25

Page 127

1 Questions from MR WEATHERBY  
 2 MR WEATHERBY: I won't be very long. Mr Nutter, I represent  
 3 Mr Grainger's partner, Gail Hadfield-Grainger.  
 4 Firstly, I just want to you help me to help the  
 5 chair and hopefully the expert next week with some  
 6 documents. Can I preface it by explaining that I am  
 7 doing it with you because some of the material that I am  
 8 going to put has only come to me today through the  
 9 diligence of counsel to the Inquiry, Ms Cartwright. But  
 10 I don't think any of it is very complicated, so I am  
 11 sure you will be able to help.  
 12 Can I just start with the policy that was in place  
 13 on 3 March, relating to MASTS and vehicle strikes.  
 14 **A. Yes, sir.**  
 15 Q. This is the easy bit. You were responsible for  
 16 rewriting that, I think?  
 17 **A. Yes, sir, the review the of the MASTS SOP. Yes, sir.**  
 18 Q. So I don't think we need to turn it up, but it is tab 4.  
 19 It is a note from you explaining this. We have looked  
 20 at this before but, just for your note, sir, the policy  
 21 and procedures bundle, at 455, is where the document is.  
 22 I am not going to take anyone to it.  
 23 But it is right, isn't it, that you in fact rewrote  
 24 version 6, so it is standard operating procedure number  
 25 8.

Page 128



<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. You rewrote it as version 6 in 2010.</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. Then, it was subsequently reviewed for version 7 and</p> <p>5 version 8, but there were no changes made on either of</p> <p>6 those reviews.</p> <p>7 <b>A. Yes, sir, that would have been a different inspector,</b></p> <p>8 <b>I believe.</b></p> <p>9 Q. Yes.</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. So the version 8 that was in force and that the all of</p> <p>12 the officers were subject to this policy on 3 March,</p> <p>13 although it was version 8, it was really your version 6</p> <p>14 that had been reviewed, but it was still in force, yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Therefore, it was also the policy that related to the</p> <p>17 training during that period?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Now, moving on to the training.</p> <p>20 <b>A. Can I just clarify something on that point, please, sir?</b></p> <p>21 Q. Yes, of course.</p> <p>22 <b>A. The SOP would -- obviously, written by me, would be</b></p> <p>23 <b>an operational SOP and the Firearms Training Unit would</b></p> <p>24 <b>then base their training on that SOP, but I would not</b></p> <p>25 <b>have written the training package for the training of</b></p> <p style="text-align: center;">Page 129</p>	<p>1 material respects, it is similar to the later one which</p> <p>2 I am just about to turn to. That is by way of</p> <p>3 explanation.</p> <p>4 So G1, page 51, that is the training package that</p> <p>5 Q9, the shooter on 3 March, that is the package that he</p> <p>6 would have been trained on in May of 2010?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. Could I ask you, in the same bundle, to turn on to</p> <p>9 page 245, please.</p> <p>10 This is a further package. This is a refresher</p> <p>11 package and this is the package for a course,</p> <p>12 a refresher course that Q9 went on in November 2011.</p> <p>13 <b>A. Okay, sir, yes.</b></p> <p>14 Q. The chair has looked at parts of this already, so I just</p> <p>15 want to ask you about it. If you cannot help, just say.</p> <p>16 But, having been on the training, you may be able to</p> <p>17 help.</p> <p>18 The package itself, the training itself, this</p> <p>19 refresher course, is one day I think? It says one day</p> <p>20 on page 245, in fact. Yes?</p> <p>21 THE CHAIRMAN: At the top.</p> <p>22 <b>A. Yes. Yes, sir.</b></p> <p>23 <b>MR WEATHERBY: Going through the training package, we come</b></p> <p>24 <b>to a PowerPoint, at page 255.</b></p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 131</p>
<p>1 <b>it. They would base their package on my SOP.</b></p> <p>2 Q. Thank you very much for that. That is very helpful.</p> <p>3 Can I just move on to the training package. So did</p> <p>4 you have anything to do with the training packages at</p> <p>5 all?</p> <p>6 <b>A. No, sir.</b></p> <p>7 Q. Right. Are you familiar with them? Have you seen them?</p> <p>8 <b>A. I went through the training, sir, so in that sense I was</b></p> <p>9 <b>a student.</b></p> <p>10 Q. Right; okay.</p> <p>11 Again, just to help us with the process, I have put</p> <p>12 parts of two of the training packages to different</p> <p>13 witnesses and it turns out that there is a third one</p> <p>14 that would have been applicable as well, so I am just</p> <p>15 going to ask you to help me with that.</p> <p>16 So just so we can follow it, could you have</p> <p>17 bundle G1 to hand, please. Page 51, first of all. Do</p> <p>18 you have page 51? That is the first page after training</p> <p>19 package from May 2010. It has been clarified with me,</p> <p>20 sir, that Q9 went on a conversion, a MASTS conversion</p> <p>21 course between 10 and 14 May.</p> <p>22 THE CHAIRMAN: Yes.</p> <p>23 MR WEATHERBY: It has been confirmed by GMP that this was</p> <p>24 the training package which applied to that course. This</p> <p>25 is the package which I haven't put. But happily, in</p> <p style="text-align: center;">Page 130</p>	<p>1 Q. So am I right that primarily the training would be going</p> <p>2 through that PowerPoint and certain other materials</p> <p>3 might be added into it?</p> <p>4 <b>A. Well, the beginning of the training would be the</b></p> <p>5 <b>PowerPoint, but then it would swiftly move on to actual</b></p> <p>6 <b>physical activity.</b></p> <p>7 Q. Right, that is very helpful. I am going to come on to</p> <p>8 that in a moment. Before we come on to the physical</p> <p>9 activity, would that be scenarios?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. Before we come on to that, is there anything else that</p> <p>12 would form the training package on a refresher, on a one</p> <p>13 day refresher in an event in 2011?</p> <p>14 <b>A. No, generally it would be a PowerPoint and then moving</b></p> <p>15 <b>on to the scenario based training. That would be my</b></p> <p>16 <b>understanding, sir.</b></p> <p>17 Q. So there wouldn't be anything, for example, from the</p> <p>18 National Police Firearms Training Curriculum?</p> <p>19 <b>A. Well, this whole package would be based on the National</b></p> <p>20 <b>Police Firearms Training Curriculum and also the GMP</b></p> <p>21 <b>SOP, which was in part based on the national curriculum.</b></p> <p>22 Q. I think, in fact, the SOP, which we have referred to</p> <p>23 earlier, was sent to the officers before the refresher.</p> <p>24 Is in a right?</p> <p>25 <b>A. I am not aware of that, sir.</b></p> <p style="text-align: center;">Page 132</p>

1 Q. It was either sent to them or they would be provided  
 2 with it at the refresher.  
 3 **A. Yes, I don't remember that being the case, sir. I don't**  
 4 **remember that I would read an SOP before refresher**  
 5 **training. I think that sounds quite unusual, actually.**  
 6 Q. Okay. It would be at the refresher then, as far as you  
 7 are concerned?  
 8 **A. I don't think the SOP would be -- I think the training**  
 9 **package which is based on the SOP, but I don't think**  
 10 **officers would be looking at the actual SOP that sat**  
 11 **with policy and compliance, so I would say that not**  
 12 **correct, sir. That would be my view.**  
 13 Q. Right. Would there be any other material then -- we  
 14 have referred to the curriculum then, the national  
 15 curriculum, would there be anything in relation to that,  
 16 for example, or would it simply be the PowerPoint?  
 17 **A. No, because instructors are trained to take the**  
 18 **curriculum, tease it out, and then provide it as a**  
 19 **training package to students. Students would not**  
 20 **necessarily be seeing the raw curriculum.**  
 21 Q. You say, "Not necessarily", can you help us any more  
 22 than that? Is this, what we have here, is this what the  
 23 students would have seen or would they have seen  
 24 anything else, for example modules for the curriculum?  
 25 **A. No, I think they would have seen the PowerPoint and then**

Page 133

1 **gone on to the scenarios, and they wouldn't have seen**  
 2 **the curriculum or the SOP.**  
 3 Q. Again, just to ground the scenarios with some documents  
 4 I have referred to earlier -- I think we have finished  
 5 with that bundle, thank you very much, but can you look  
 6 at bundle X, please. It is page 372.  
 7 **A. Yes, sir.**  
 8 Q. I am doing it this way because I believe the chair has  
 9 looked at this before and so I am trying to keep the  
 10 documents in some kind of comprehensible order.  
 11 This is an email which is replying to an email from  
 12 Mark Williams, who at that point is getting information  
 13 together, material together, for Mr Molloy, who was the  
 14 original expert instructed by the IPCC.  
 15 **A. Yes, sir.**  
 16 Q. So the questions at the bottom of 372 and over to 373.  
 17 It is point 6 and point 7 that I just want to refer to  
 18 through you. There, Mr Williams obviously has some  
 19 knowledge of what is on the training package, that we  
 20 have just looked at, and is asking for the material from  
 21 that, yes?  
 22 **A. Okay, yes.**  
 23 Q. So it refers to a particular scenario which I am going  
 24 to take you to in a moment. And on 7, whether Q9  
 25 undertook that scenario, yes?

Page 134

1 **A. Yes.**  
 2 Q. Now, if you jump to page 389 in the same bundle, these  
 3 are the answers from Mr Whittle.  
 4 **A. Okay.**  
 5 Q. If you look at 6 and 7, the corresponding answers. So,  
 6 again, the November MASTS training package is referred  
 7 to:  
 8 "The training consisted of the three main scenarios  
 9 listed as scenarios, and once completed the instructor  
 10 could choose from the other lists additional to provide  
 11 different scenarios to achieve learning. There is no  
 12 record of who did what on the day."  
 13 Yes?  
 14 **A. Yes.**  
 15 Q. And then 7:  
 16 "I am not able to say whether Q9 completed 15 or  
 17 not."  
 18 Yes?  
 19 **A. Yes.**  
 20 Q. So that is the training department answering the query  
 21 that has been made to them and referring to the  
 22 scenarios which is what you helpfully earlier spoke  
 23 about, yes?  
 24 **A. Yes.**  
 25 Q. Now, you should have I think in front of you, and

Page 135

1 I think, sir, so should you, those scenarios?  
 2 **A. Thank you.**  
 3 Q. The first page then, they are not referenced at the  
 4 moment, but I have no doubt they will be, that scenarios  
 5 1, 2 and 3 are plainly the ones which would have been  
 6 gone through, yes?  
 7 **A. Although I can't see any -- ah.**  
 8 Q. Then there is an additional two pages which refers to  
 9 another 13, so there are 16 in total?  
 10 **A. So, sorry sir, can you clarify that the second page on**  
 11 **the document I've got is scenario 1, scenario 2,**  
 12 **scenario 3, and then there is a matrix with numbers 4 to**  
 13 **12 -- that is what I have.**  
 14 Q. Yes, I am referring to the scenarios 1 to 3 is the first  
 15 page?  
 16 THE CHAIRMAN: 4 to 16 actually, because they go over page.  
 17 **A. Yes, I've got those. Thank you, yes.**  
 18 **MR WEATHERBY: I am referring to scenarios 1, 2 and 3. Then**  
 19 **it obviously carries on with the additional, yes?**  
 20 **A. Yes.**  
 21 Q. So the three would have been gone through on the  
 22 training package, yes?  
 23 **A. Yes.**  
 24 Q. Then it would be up to the instructor as to which, if  
 25 any, of the others would be gone through?

Page 136

1 **A. Yes.**  
 2 Q. That is the way the training package would be delivered  
 3 over the full day?  
 4 **A. Yes, that seems to me --**  
 5 Q. You have a PowerPoint and that training about the SOP,  
 6 about GMP policy?  
 7 **A. Yes.**  
 8 Q. Then you would go on to do the practical exercises?  
 9 **A. That's correct, yes.**  
 10 Q. Are you familiar with those exercises?  
 11 **A. Well, it is too long ago for me to be able to remember**  
 12 **exactly what they were but they look like the types of**  
 13 **scenarios we would have done.**  
 14 Q. In that case then I will leave it at that and I will not  
 15 take that any further.  
 16 Can I just ask you to put those down, there is just  
 17 one other area. I want to return to the events of  
 18 3 March.  
 19 You have told us already that you went to  
 20 Claytonbrook --  
 21 **A. Yes.**  
 22 Q. -- and met with all of the AFOs involved --  
 23 **A. Yes.**  
 24 Q. -- for welfare purposes.  
 25 Did you give them any instruction or advice about

Page 137

1 a stage 3 initial account?  
 2 **A. No, sir.**  
 3 Q. Was that because that was not your place to do so?  
 4 **A. Absolutely, sir, yes.**  
 5 Q. So it certainly was not the case that you would have  
 6 given them any instruction about that?  
 7 **A. No, sir. Not unless the post-incident manager**  
 8 **Mr Simpson had asked me to do that.**  
 9 Q. And he didn't?  
 10 **A. No, sir.**  
 11 Q. On 8 March, you would have known, presumably, that 13 of  
 12 those 16 officers had not provided a stage 3, never mind  
 13 a stage 4, account?  
 14 **A. Yes, sir.**  
 15 Q. And you have told us already that the meeting was about  
 16 welfare and you have told Mr Thomas that the timing of  
 17 the accounts was a welfare issue?  
 18 **A. Yes.**  
 19 Q. That is your belief, is it?  
 20 **A. Yes, sir, some of the officers would have felt anxious**  
 21 **about when they were going to give the statement.**  
 22 Q. Was there anything that would have stopped them  
 23 providing a stage 3 account and note?  
 24 **A. The stage 3 account on the night?**  
 25 Q. Or subsequent?

Page 138

1 **A. On the night, the stage 3 account, the reasons that may**  
 2 **have stopped them from doing that would have been simply**  
 3 **the time I think that it takes to go through the process**  
 4 **and the welfare issues around how long they had been on**  
 5 **duty, et cetera, but nothing beyond that.**  
 6 Q. So there is no reason -- I mean, we know that they were  
 7 on duty for something like 11 hours, after the incident.  
 8 **A. Yes.**  
 9 Q. But leaving that time on one side for a moment, there is  
 10 no reason that you know about as to why they couldn't  
 11 have provided the stage 3 account on the 4th or the 5th  
 12 or the 6th or the 7th or 8th before the meeting that you  
 13 attended at?  
 14 **A. No, just the logistics of organising it and also the**  
 15 **fact that there may have been a debate in relation to**  
 16 **how they would provide that evidence.**  
 17 Q. Yes. Well, was there such a debate?  
 18 **A. I am aware that the officers were considering how they**  
 19 **should give that evidence and, from memory, I believe**  
 20 **the IPCC would have been keen for them to be interviewed**  
 21 **and the officers were not keen to do that.**  
 22 Q. How were you aware of that?  
 23 **A. How was I aware that they were not keen to do so?**  
 24 Q. No, how were you aware of that debate at all?  
 25 **A. From memory, I think it would have been discussions that**

Page 139

1 **I would have had with the Professional Standards Branch**  
 2 **but I can't remember exact discussions, timings,**  
 3 **et cetera.**  
 4 Q. What about discussions with the AFOs themselves?  
 5 **A. Possibly, sir, but I can't recollect any specific**  
 6 **discussions but I was aware that was a general feeling**  
 7 **that they were nervous around that.**  
 8 Q. You cannot remember any specific discussions about the  
 9 manner of which stage 3 or stage 4 accounts should be  
 10 given?  
 11 **A. The stage 4 accounts, I can't remember any discussions**  
 12 **in relation, specific discussions -- just generally that**  
 13 **they felt nervous about providing their evidence in that**  
 14 **way.**  
 15 Q. You see, the chair has already seen and it is -- let me  
 16 ask you to turn this up at Y/1113. Bundle Y/1113.  
 17 **A. Yes, sir.**  
 18 Q. This is an email from Mr Brennan of professional  
 19 standards to Mr Bergmanski of the IPCC, relating to the  
 20 meeting that you have told us you were at.  
 21 **A. Yes.**  
 22 Q. Have you read that?  
 23 **A. The first email, sir?**  
 24 Q. Yes, the first email, it is only short. (Pause)  
 25 **A. Yes.**

Page 140

1 Q. I mean it is clear, isn't it, that you were a party to  
 2 a discussion in this meeting before any account at all  
 3 had been given by 13 of your officers, not just about  
 4 welfare, not just about timing of statements, but about  
 5 the manner in which they were given?  
 6 THE CHAIRMAN: Why do you say this witness as a party --  
 7 MR WEATHERBY: Because he was at the meeting, sir.  
 8 THE CHAIRMAN: Sorry, I see. Not this email exchange?  
 9 Sorry, I misunderstood.  
 10 MR WEATHERBY: To clarify, this is about the meeting that  
 11 you were at, isn't it?  
 12 **A. Yes.**  
 13 Q. It is clear, isn't it, that you were a party to this?  
 14 **A. Yes, but I don't remember, I don't recollect it being as**  
 15 **clear-cut as this, sir, because I was involved in the**  
 16 **creation of the post-incident process at Manchester,**  
 17 **Greater Manchester, and that issue around firearms**  
 18 **officers providing either written statements or evidence**  
 19 **on interview was very topical and most of the officers**  
 20 **would have been aware of it even before any discussion**  
 21 **would have taken place potentially with the PFOA.**  
 22 Q. I mean, "As a result, they now do not wish to provide  
 23 statements." So this is an issue that they have raised  
 24 or the PFOA has raised or you have raised -- someone has  
 25 raised it at this meeting and as a result, "now" they do

Page 141

1 not wish to provide statements on audio to the IPCC.  
 2 **A. I think this was an area that they were concerned about**  
 3 **and I believe that, at that meeting, it was one of the**  
 4 **topics of conversation around their welfare and this**  
 5 **would have been discussed, but it was something they**  
 6 **were already aware of and would have already had a view**  
 7 **on.**  
 8 Q. How is this a matter of welfare?  
 9 **A. Because the anxiety in relation to whether you go to the**  
 10 **IPCC and your voice is recorded and your voice is**  
 11 **potentially shown and whether that would have any issues**  
 12 **in relation to your anonymity in the future, these are**  
 13 **all points that firearms officers do get quite anxious**  
 14 **about and have a professional opinion on and it does**  
 15 **affect their welfare and in particular their families**  
 16 **and partners who also have a view on this.**  
 17 Q. In terms of the anxiety of providing an account, would  
 18 it be right that the anxiety would be much the lesser if  
 19 they had put at least their stage 3 account down before  
 20 8 March, as of course they could have done?  
 21 **A. Potentially, but the counter argument was that there**  
 22 **simply was not enough time for them to do that on the**  
 23 **night, to draw out that process any longer could have**  
 24 **been counterproductive.**  
 25 Q. But, as I put to you before, why could they not do

Page 142

1 an account in their pocket notebook or in a witness  
 2 statement or in a daybook, or wherever, on 4 March,  
 3 5 March, 6 March, 7 March, or 8 March?  
 4 **A. I think --**  
 5 Q. Why not?  
 6 **A. I think it wouldn't have been appropriate to do it on**  
 7 **4 March, the day after the event. I think they should**  
 8 **have been given some time for their recollection and**  
 9 **their memory to settle and I think that is quite**  
 10 **accepted in terms of the process that that is good**  
 11 **practice.**  
 12 Q. In terms of the stage 4 account, then certainly there is  
 13 the cooling off process, but you are eliding the stage 3  
 14 and stage 4, aren't you?  
 15 **A. But the purpose of the stage 3 account is to give**  
 16 **an account on the night for the benefit of the IPCC and**  
 17 **any other investigators, so if it was given two or three**  
 18 **days later, I think you might as well wait for the full**  
 19 **account, the stage 4 account.**  
 20 Q. And then not bother with the stage 3 account, just elide  
 21 it with the stage 4 account, is that your evidence?  
 22 **A. I would suggest that that is an option for the**  
 23 **post-incident manager and the team, yes, sir.**  
 24 Q. And is not the purpose of putting a first account down  
 25 generally in any investigation to get the best initial

Page 143

1 account down before memory fades?  
 2 **A. Not necessarily, sir. I think the accepted opinion is**  
 3 **you get your best account after some time has passed and**  
 4 **the dust is allowed to settle, as it were, and the stage**  
 5 **3 account on the night is actually designed for**  
 6 **something slightly different, it is designed to assist**  
 7 **the investigators to get some information.**  
 8 Q. I am not going to fence with you about that.  
 9 The purpose of an initial account is to get the bare  
 10 bones details of the matter down, isn't it, then after  
 11 a cooling off period the fuller account is aided by that  
 12 period to have more recollection. Isn't that the  
 13 reality?  
 14 **A. I would say the subtle difference is the other way**  
 15 **round, that we get an initial account straight after the**  
 16 **event to assist the investigators, but the better**  
 17 **account would be taken after a period of time.**  
 18 **So I would argue that it was the other way round**  
 19 **than the way you put it.**  
 20 **MR WEATHERBY: I am not going to take it any further.**  
 21 **Thank you very much.**  
 22 THE CHAIRMAN: Ms Whyte, do you have any questions.  
 23 MS WHYTE: Yes, very few.  
 24  
 25

Page 144

1 Questions from MS WHYTE  
 2 MS WHYTE: Mr Nutter, were you still in post when Z15 became  
 3 an SFO in 2013?  
 4 **A. A CTSFO, ma'am?**  
 5 Q. No, an SFO.  
 6 My understanding from the recent witness statement  
 7 from him was that in 2013 he qualified as an SFO and  
 8 then in the spring of 2014, he qualified as a CTSFO?  
 9 **A. Yes, ma'am. Yes, I was.**  
 10 Q. You were still in post?  
 11 **A. Yes, I was.**  
 12 Q. How was he doing by that stage?  
 13 **A. Very well, ma'am. He is a very credible member of the**  
 14 **team, very calm, very methodical, no issues at all with**  
 15 **him as a specialist firearms officer.**  
 16 Q. So happily the provisional assessment of  
 17 Inspector Williams of mid March of having grave concerns  
 18 over his suitability to remain as an AFO were happily  
 19 unfounded, they were well-intentioned and no doubt  
 20 appropriate at the time?  
 21 **A. Yes, ma'am.**  
 22 Q. Are you able to assist us with the general failure rate  
 23 in about 2015 of officers on the CQC live fire part of  
 24 the training?  
 25 THE CHAIRMAN: Do you mean in 2015?

Page 145

1 MS WHYTE: In 2012, I am so sorry.  
 2 **A. In 2012, ma'am?**  
 3 Q. Yes.  
 4 **A. Around that time we had just finished the**  
 5 **Metropolitan Police phase 1 training, if you like, for**  
 6 **the security operation at London for the Olympics, and**  
 7 **I would say all the forces that were sending officers**  
 8 **were, the failure rate amongst the forces -- Greater**  
 9 **Manchester Police did well, we only had one failure out**  
 10 **of 16, but other forces it was up to 40 or 50 per cent.**  
 11 Q. If you had reviewed the course notes of X7 immediately,  
 12 on potential receipt in late February, would you have  
 13 prevented him from continuing immediately in his duties  
 14 as an AFO or as an OFC?  
 15 **A. No, ma'am.**  
 16 Q. If a TFC returning from a Northern Ireland Joint  
 17 Services Specialists Course returned with a "not yet  
 18 competent" assessment, would that ordinarily require  
 19 immediate and anxious scrutiny of whether they could  
 20 continue as a cadre TFC?  
 21 **A. Not in my opinion, ma'am, no.**  
 22 Q. Would it require particular communication from the  
 23 providers of that course to raise with the force  
 24 a particular concern that might then lead to anxious  
 25 scrutiny and being categorised as offline whilst that

Page 146

1 was investigated?  
 2 **A. Yes, if they had that concern, yes, ma'am.**  
 3 MS WHYTE: Thank you very much.  
 4 Thank you, sir.  
 5 THE CHAIRMAN: Do you have anything further?  
 6 MR BEER: I am not sure there is much I can usefully ask of  
 7 this witness.  
 8 THE CHAIRMAN: Thank you, Mr Nutter that is the end of your  
 9 evidence. You are free to go.  
 10 We are back to the Tuesday --  
 11 MR BEER: 10.30 on Tuesday?  
 12 THE CHAIRMAN: The Tuesday to Friday timetable. 10.30 on  
 13 Tuesday. Thank you.  
 14 (3.55 pm)  
 15 (The Inquiry adjourned until 10.30 am on Tuesday,  
 16 25 April 2017)

Page 147

I N D E X

1  
 2  
 3 MR BRIAN DAVIES (sworn) .....1  
 4 Questions from MR BEER ..... 1  
 5 Questions from THE CHAIRMAN .....63  
 6 MR MARK NUTTER (sworn) .....65  
 7 Questions from MR BEER .....65  
 8 Questions from MR THOMAS .....118  
 9 Questions from MR WEATHERBY .....128  
 10 Questions from MS WHYTE ..... 145  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 148

<b>A</b>				
<b>ability</b> 94:24 97:10 97:13 113:12	<b>accuracy</b> 87:23 88:1	<b>advantages</b> 62:8	<b>allegations</b> 126:5,7 126:8,12,13,21,25 127:1,9,12,14	<b>applicable</b> 130:14
<b>able</b> 26:8 27:3 47:4 69:23 71:2 73:9 79:23 81:4,8 82:4 83:16 88:1,6 89:1 93:19 98:10,16 99:21 100:3 103:5 119:12 121:18,18 128:11 131:16 135:16 137:11 145:22	<b>accurate</b> 30:24 31:5 81:21 82:16 82:18 85:9,12,20 87:18 101:11,15 110:22	<b>advice</b> 11:18,20 31:22 51:15 114:4 122:20,25 137:25	<b>allocation</b> 34:8	<b>application</b> 20:13
<b>absolute</b> 59:6	<b>achieve</b> 17:3 31:24 45:1 113:1 135:11	<b>advise</b> 79:23	<b>allow</b> 64:19 116:19	<b>applied</b> 130:24
<b>absolutely</b> 82:23 86:10 87:14 138:4	<b>accurately</b> 81:12	<b>adviser</b> 68:12 78:21 79:22 84:13,19 85:4,7,11,18,23 85:25 86:4,6,18 87:12,22	<b>allowed</b> 79:11 86:13 100:5 112:17 120:10 144:4	<b>applies</b> 8:6
<b>ACC</b> 47:8 49:15,17 57:5,22 58:8,19 59:19 61:22	<b>achieved</b> 73:10	<b>adviser's</b> 86:7	<b>allowing</b> 93:9	<b>apply</b> 9:10 38:15 62:2
<b>accept</b> 24:2 44:4 49:12 89:4 109:9 122:10 123:15,22 126:25	<b>achieving</b> 31:4	<b>advisers</b> 56:23 86:13	<b>allows</b> 122:2	<b>approach</b> 11:11 14:19 16:10,11 17:14 27:13 34:18 46:13 73:5 83:14 103:13,14
<b>accepted</b> 143:10 144:2	<b>ACPO</b> 8:18 9:8 13:19 14:2,17,19 14:23 15:1 16:4 16:10,13 17:15 21:7,9,12 22:5 37:1 45:21 46:13	<b>affairs</b> 19:11	<b>alpha</b> 125:18,22	<b>approached</b> 14:23
<b>access</b> 86:4 109:11	<b>acting</b> 8:23	<b>affect</b> 5:20 71:21 72:9 142:15	<b>alterations</b> 55:13 55:17	<b>approaching</b> 14:17 15:1 16:4,13
<b>account</b> 25:8 35:6 121:19 122:1,4,6 122:8,24 123:4,6 123:15,17,19,21 138:1,13,23,24 139:1,11 141:2 142:17,19 143:1 143:12,15,16,19 143:19,20,21,24 144:1,3,5,9,11,15 144:17	<b>action</b> 51:7 68:17 69:5	<b>AFO</b> 67:8 68:9,11 79:25 97:10 109:21 112:18 113:12 145:18 146:14	<b>altering</b> 63:19	<b>appropriate</b> 23:19 38:13 143:6 145:20
<b>accounts</b> 115:19,23 116:5 120:3,12,13 138:17 140:9,11	<b>actions</b> 54:13 103:2 113:24	<b>AFOs</b> 69:7,20 70:20 89:8 137:22 140:4	<b>alternative</b> 9:1 16:22 31:16	<b>approval</b> 4:12 8:10 14:18 15:15 16:18 18:9 41:23 42:25 51:12 52:18
<b>accreditation</b> 71:3 71:5,21,22 72:9	<b>active</b> 18:2 97:7	<b>afraid</b> 17:8	<b>American</b> 25:18	<b>approve</b> 15:13
<b>accredited</b> 71:13 71:16 72:10,16 110:11	<b>activity</b> 132:6,9	<b>agencies</b> 24:11 30:21	<b>amount</b> 31:12 56:3 61:14 86:24	<b>approved</b> 8:24 10:17 12:23,25 13:12 16:12 18:11 18:21 24:12,12,14 35:23 39:21 41:5 42:19 44:22 45:17 47:8 49:23,24
	<b>actual</b> 4:16 29:23 61:4,20 73:10 84:16 87:11 115:10 121:25 132:5 133:10	<b>ago</b> 42:21 63:10 75:23 124:15 137:11	<b>analysing</b> 80:24	<b>approval</b> 4:12 8:10 14:18 15:15 16:18 18:9 41:23 42:25 51:12 52:18
	<b>adapting</b> 64:4	<b>agree</b> 7:7 22:13 37:23 79:7 82:12 82:13 84:3 85:2 105:12,13 109:6 113:16 122:17	<b>analysis</b> 52:7,11	<b>approve</b> 15:13
	<b>add</b> 98:5 105:8	<b>agreed</b> 26:13 80:13 83:4 84:9 107:6	<b>and/or</b> 42:25 44:2	<b>approved</b> 8:24 10:17 12:23,25 13:12 16:12 18:11 18:21 24:12,12,14 35:23 39:21 41:5 42:19 44:22 45:17 47:8 49:23,24
	<b>added</b> 89:18 132:3	<b>agreement</b> 25:9 57:9	<b>Andrew</b> 3:12	<b>approximately</b> 68:2,3,15
	<b>additional</b> 73:12 135:10 136:8,19	<b>ah</b> 136:7	<b>Andy</b> 28:3	<b>April</b> 1:1 25:18 26:13,18 66:11 147:16
	<b>additionally</b> 21:20	<b>aided</b> 144:11	<b>Andy's</b> 28:14	<b>area</b> 16:2 73:19,22 73:24 74:4,19 94:8 137:17 142:2
	<b>address</b> 106:10	<b>aim</b> 30:22 31:4,16	<b>annual</b> 71:5	<b>areas</b> 72:21 121:11
	<b>addressed</b> 21:12	<b>air</b> 39:7	<b>annually</b> 71:1	<b>argue</b> 72:13 80:12 81:14 98:6,24 99:4 120:21,25 126:17 144:18
	<b>adds</b> 99:2	<b>albeit</b> 50:17	<b>anonymity</b> 142:12	<b>argued</b> 112:21
	<b>adhere</b> 122:23	<b>allegation</b> 127:3	<b>answer</b> 9:4 17:20 72:11 77:3 78:10 97:20,22 114:6	<b>argument</b> 121:17 142:21
	<b>adjoined</b> 147:15		<b>answering</b> 135:20	
	<b>adjournment</b> 44:15 65:4 118:4		<b>answers</b> 17:7 135:3 135:5	
	<b>administrative</b> 3:3		<b>Anthony's</b> 118:8	
	<b>Admittedly</b> 10:21		<b>anxiety</b> 142:9,17,18	
			<b>anxious</b> 138:20 142:13 146:19,24	
			<b>anybody</b> 64:10 117:23	
			<b>Apart</b> 47:2	
			<b>apologised</b> 75:11	
			<b>appear</b> 41:1 53:17 60:21	

<b>arising</b> 64:10	88:11,24 94:22	15:25 40:20 58:6	91:14 92:11 95:2	66:16 69:10
<b>armed</b> 2:21,24 7:17 48:24 67:3 69:3	98:7,14,24 99:5,7 99:8,9,17,20,22 99:23,24 100:14	68:14 <b>authorise</b> 48:14 <b>authorised</b> 9:15,23 9:25 13:13 29:9 40:5,8,10 55:9 73:14	96:6,7 101:22 104:1 105:22 107:9 110:3,10 111:10,14 147:10	138:19 <b>believe</b> 12:16 55:14 74:19 99:14 119:21 122:18 126:22 129:8 134:8 139:19 142:3
<b>armour</b> 3:19	100:15 104:19	<b>authority</b> 28:25 29:10 52:4 61:22 62:4,18,22 68:6 86:1,2 109:22	<b>background</b> 1:21 7:23	<b>believed</b> 15:11 43:8 <b>believing</b> 18:10 40:17,20
<b>arrange</b> 74:3 76:4	110:16 127:7	<b>automatically</b> 39:23	<b>backing</b> 28:3 30:10	<b>benefit</b> 80:16,19 98:10 99:3 100:7 143:16
<b>arranged</b> 70:24,25 76:7	145:16 146:18	<b>availability</b> 43:13 57:1	<b>bad</b> 106:20 107:21 113:25	<b>benefits</b> 28:6
<b>arrangements</b> 64:17,19 115:25	<b>assessments</b> 49:5 100:16,22	<b>available</b> 12:8 38:24 56:8 99:15 110:19,20 112:11	<b>balance</b> 101:15	<b>Bergmanski</b> 140:19
<b>arranging</b> 72:24	<b>assist</b> 26:8 72:13 82:17,19 83:17 96:22 110:23 114:15 123:1 144:6,16 145:22	<b>aware</b> 3:10 4:13,16 19:17,20,25 26:9 26:16 27:12,16,18 28:12 35:16 38:16 47:18 50:7 53:3 57:1 58:10 65:6 72:3 74:8,20 75:15,16 76:12 90:15,18,20,25 91:11 96:1 117:4 121:13 125:4,7,9 126:17 127:11,14 132:25 139:18,22 139:23,24 140:6 141:20 142:6	<b>balanced</b> 101:11 110:21	<b>best</b> 1:19 50:22 52:25 66:16 88:18 88:20 107:6 109:6 109:10 143:25 144:3
<b>arrest</b> 30:22 31:2 69:6 126:3,4,4,14	<b>assistance</b> 27:2	<b>awareness</b> 4:22,23 56:22	<b>bar</b> 115:22	<b>better</b> 117:25 121:15 124:16 144:16
<b>arrived</b> 3:15 4:1 22:19 61:16	<b>assistant</b> 18:8 29:4 34:25 40:1,6,16 40:19,22,25 45:1 50:6 57:20	<b>bearing</b> 71:8	<b>bare</b> 144:9	<b>beyond</b> 114:23 125:4 139:5
<b>Arundale</b> 7:16	<b>assisting</b> 78:1	<b>Beechwood</b> 24:15 24:16 25:6,9 26:7 39:1 60:7	<b>base</b> 129:24 130:1	<b>bit</b> 9:22 22:25 51:20 52:15 53:25 59:3 65:11 112:23 128:15
<b>ARV</b> 106:25 107:7	<b>associated</b> 21:11 93:11	<b>Beer</b> 1:3,4,9,10,10 26:10,11 34:10,13 34:14 44:17 63:3 63:11 64:14,17 65:1,11,14,19,20 65:20 68:6 117:16 118:11 119:22 147:6,11 148:4,7	<b>based</b> 17:2 44:22 45:17 46:17 55:11 104:14 132:15,19 132:21 133:9	<b>BlackBerry</b> 47:6
<b>asked</b> 51:25 58:13 107:14 119:23 138:8	<b>association</b> 119:19 120:18	<b>beginning</b> 18:25 132:4	<b>basic</b> 113:4,13	<b>blank</b> 104:16
<b>asking</b> 9:5 10:11 17:9 33:25 34:10 34:11 36:1 48:14 55:18 93:17 94:16 95:23 101:17 124:15 134:20	<b>assume</b> 20:17 76:24 105:1	<b>begins</b> 30:18	<b>basing</b> 126:18	<b>block</b> 59:6
<b>aspects</b> 20:17	<b>assumption</b> 39:21	<b>behalf</b> 1:11 29:6 32:5 65:21	<b>basis</b> 2:10 4:5 6:22 15:17 34:8 38:11 53:15 79:6	<b>blue</b> 107:11
<b>assault</b> 126:3,3,4 127:9	<b>assurance</b> 89:7	<b>belief</b> 1:19 8:23 12:24 39:21 42:7	<b>basis</b> 15:17 34:8 38:11 53:15 79:6	<b>bodies</b> 13:22
<b>assaulted</b> 125:8	<b>Atomic</b> 52:4		<b>bearing</b> 71:8	<b>body</b> 14:5 30:2 72:23
<b>assaults</b> 126:14	<b>attached</b> 27:6 28:3	<b>B</b>	<b>Beechwood</b> 24:15 24:16 25:6,9 26:7 39:1 60:7	<b>bones</b> 144:10
<b>assess</b> 20:14 100:3 100:24 103:15,16	<b>attempt</b> 104:12,13	<b>b</b> 40:21 41:23 48:24	<b>Beer</b> 1:3,4,9,10,10 26:10,11 34:10,13 34:14 44:17 63:3 63:11 64:14,17 65:1,11,14,19,20 65:20 68:6 117:16 118:11 119:22 147:6,11 148:4,7	<b>book</b> 86:5,7 96:10 <b>booklet</b> 85:22 86:19,21,22 87:4 87:5,10
<b>assessed</b> 20:25 21:3 78:16	<b>attend</b> 76:5 98:10 112:13 114:12 116:8	<b>back</b> 4:15 8:21 17:18 18:25 19:14 27:19 38:20 42:3 42:14 43:6 49:17 51:10 54:17 58:14 59:1 60:25 64:15 64:18 67:11 82:5	<b>basic</b> 113:4,13	<b>books</b> 86:11
<b>assessing</b> 87:21 98:17	<b>attendance</b> 102:5 118:12		<b>basing</b> 126:18	<b>bother</b> 143:20
<b>assessment</b> 22:8,23 30:4 47:9,15,16 47:19,21,24 48:5 48:16,19,22 49:8 49:11,14 55:15 73:24 77:19 78:14 78:25 79:8 80:10 80:11 82:17,19 85:14 87:23 88:5	<b>attended</b> 77:19 98:20 116:9 139:13 <b>attendee</b> 38:1 <b>attention</b> 25:12 54:5,9 89:13 <b>audio</b> 142:1 <b>author</b> 22:14 <b>authorisation</b>		<b>beginning</b> 18:25 132:4	

<b>bottom</b> 60:4 134:16	131:8 134:5,6	94:20 97:3 102:1	127:21 130:22	<b>clarity</b> 101:9
<b>bound</b> 122:24	135:2 140:16	123:16,20 124:3	131:21 136:16	110:20
<b>box</b> 60:3	<b>business</b> 54:15	133:3 137:14	141:6,8 144:22	<b>Claytonbrook</b>
<b>branch</b> 19:12 117:8	74:19	138:5	145:25 147:5,8,12	70:16 114:17,20
140:1	<b>busy</b> 32:12,25	<b>cases</b> 78:24	148:5	118:12 137:20
<b>breaches</b> 103:12		<b>categorised</b> 146:25	<b>challenged</b> 74:9,12	<b>clear</b> 6:6 8:16
113:11	<b>C</b>	<b>cause</b> 6:22 55:23	<b>chance</b> 113:22	18:20 21:7 35:9
<b>break</b> 44:13 64:15	<b>c</b> 48:25	64:4 71:24 74:6	<b>changed</b> 114:2	44:20 121:25
117:18,25	<b>cadre</b> 146:20	108:18	<b>changes</b> 129:5	141:1,13
<b>Brennan</b> 140:18	<b>call</b> 83:1	<b>caused</b> 20:23 52:17	<b>channel</b> 24:18	<b>clear-cut</b> 141:15
<b>Brian</b> 1:5,6 148:3	<b>called</b> 79:8 102:16	<b>cell</b> 88:16	<b>characteristics</b>	<b>clearly</b> 9:18 22:20
<b>bridge</b> 19:18	102:18,20 113:11	<b>cent</b> 68:15,21	56:24	25:6 53:1 63:24
<b>brief</b> 92:10	114:13	146:10	<b>charge</b> 3:18,19,20	118:23
<b>briefed</b> 26:17 68:7	<b>calm</b> 145:14	<b>central</b> 41:8	3:21,22 5:9 69:25	<b>closely</b> 77:1
<b>briefing</b> 4:11 18:17	<b>canister</b> 4:12 11:1	<b>centrally</b> 8:17 9:8	70:1,17 94:18	<b>closer</b> 26:24
28:4,15,17 41:1	12:3,5 22:24	<b>certain</b> 14:13 17:5	<b>charitable</b> 116:12	<b>CO19</b> 93:5
43:9 47:11,23	26:18 28:4 30:4	72:21 92:2,18	<b>check</b> 65:24 81:5	<b>code</b> 6:17 7:4,9,10
62:5 78:6 79:3,3	35:11,18 38:25	121:14 122:3	84:14,15,18,19,21	8:1 11:10,12 13:7
80:7 81:10,25	39:7 41:22 60:7	127:19 132:2	89:7,7	13:9 14:1 17:10
83:5,7,8,9 84:14	60:13 61:2,17	<b>certainly</b> 20:4 25:3	<b>checking</b> 84:23	18:1 19:2 22:17
85:8,19 87:23	63:9,15	74:16 122:4 126:2	85:3,7 89:8	22:17 39:11,18
88:2 89:13 91:25	<b>canisters</b> 16:1,15	138:5 143:12	<b>chemical</b> 8:24 9:20	40:4,7,13,18
<b>briefings</b> 78:8	<b>capability</b> 10:21	<b>cetera</b> 13:24 78:22	10:17 29:8 52:9	41:10,14,16,24
<b>bring</b> 12:9 15:10	70:5	81:21 84:6 86:19	<b>chief</b> 2:1,4,19 6:8	42:8,18,24 43:2
32:6 33:15 50:10	<b>capacity</b> 7:15 32:7	139:5 140:3	16:8 17:7 18:8	43:10,22,25 44:6
55:7 72:21 91:13	35:13 36:15,25	<b>CFI</b> 27:21 73:15	19:7 27:20 29:4,5	46:2,12 51:18,21
95:6 107:16	37:12,13	75:1 76:11 77:7,8	29:9 34:25 35:1	51:22 55:4 64:8
111:10	<b>car</b> 39:4 49:1	77:16 93:13 94:18	40:1,6,16,16,19	<b>codes</b> 7:19,21 9:17
<b>bringing</b> 5:7 56:5	<b>care</b> 82:9	104:13 105:19	40:22,22,24,25	11:12 13:11,14,16
111:12	<b>career</b> 77:18 79:25	110:25 111:3	41:16 43:11 44:17	39:24 40:21,24
<b>broader</b> 70:7	106:7,8,20	<b>chair</b> 128:5 131:14	50:6 57:20 59:22	41:6 42:4 46:24
<b>brought</b> 5:2 47:3	<b>carefully</b> 106:19	134:8 140:15	70:16 75:10,10,11	<b>colleagues</b> 74:25
54:4,8 72:18	<b>Carl</b> 26:7	<b>chaired</b> 29:3	75:13 76:11,21	<b>collect</b> 57:23
116:17	<b>carried</b> 60:15	<b>chairman</b> 1:3,7	101:6 104:8	<b>collectively</b> 117:11
<b>budgets</b> 3:4	112:17	5:12 26:10 34:9	105:22 112:16	<b>college</b> 2:4 6:24
<b>building</b> 62:1,4,11	<b>carries</b> 136:19	39:15 40:2 44:11	113:9 117:9	7:19,20
62:14 64:17	<b>carry</b> 13:22 14:5	53:7,16 63:5,7,8	<b>choose</b> 135:10	<b>column</b> 86:11,16
<b>buildings</b> 18:13,19	97:13 103:5,18	63:17 64:3,10,16	<b>circumstances</b>	87:9
40:9 62:2,19	110:10 112:18	64:20 65:2,6,13	14:13 17:6 18:6	<b>Combined</b> 23:21
<b>bullets</b> 9:24,25 10:4	<b>Cartwright</b> 128:9	65:16 68:4 74:9	35:10 92:2,4	<b>come</b> 16:21 40:15
10:5	<b>case</b> 2:13 13:10,11	75:23 87:15 89:16	116:19 122:3	46:3 58:14 64:15
<b>bundle</b> 1:12 19:2	33:14 34:6 36:6	95:12 102:22	<b>clarified</b> 130:19	64:18 82:20 83:14
66:2 77:23 92:21	40:17 41:9 45:25	111:11 112:10	<b>clarify</b> 102:12	92:10 95:2 96:6
104:4 107:9	82:2,25 83:22	117:21,23,25	129:20 136:10	114:10 120:17,19
128:21 130:17	86:1,2 93:10,20	120:9,15 125:20	141:10	120:23 127:2



128:8 131:23 132:7,8,11 <b>comes</b> 8:4 17:18 101:22 103:7 <b>comfortable</b> 93:22 94:2,11 <b>coming</b> 24:18 <b>commander</b> 78:20 79:24 81:3 84:11 84:13 85:5 <b>commanders</b> 56:23 56:25 <b>comment</b> 20:12 84:4 <b>comments</b> 113:19 <b>commissioned</b> 7:20 <b>commit</b> 103:12 <b>commitments</b> 3:2 <b>common</b> 55:3 69:7 69:19 84:9,11 89:6,11 108:6,9 <b>communicate</b> 58:23 <b>communication</b> 146:22 <b>communications</b> 75:20 <b>company</b> 23:20 24:4,7,9,20,20,24 25:1 <b>compare</b> 7:24 <b>compared</b> 99:2,24 <b>comparing</b> 11:2,3 99:25 <b>comparison</b> 11:5 <b>competence</b> 72:7 <b>competency</b> 71:3 72:1 94:8 98:17 <b>competent</b> 6:3 52:12 110:9 146:18 <b>complaint</b> 125:10 <b>complaints</b> 124:23 124:24,25 125:3,5 125:7 126:11	<b>complement</b> 49:4 <b>complete</b> 25:25 31:5 120:10 <b>completed</b> 5:17 46:20 53:12 120:2 135:9,16 <b>completely</b> 6:14 75:7 <b>complex</b> 4:15 <b>compliance</b> 20:16 31:12 39:18 40:3 40:6 42:18 55:4 57:5 133:11 <b>compliant</b> 26:6 31:11 <b>complicated</b> 128:10 <b>complied</b> 41:10,11 42:7 43:2,14 44:3 44:6 <b>complies</b> 41:24 <b>comply</b> 11:12 13:6 13:8 39:9 40:18 40:21,23 46:12 51:22 63:18 <b>composition</b> 27:6 52:11 <b>comprehensible</b> 134:10 <b>compressed</b> 39:7 <b>concentrate</b> 125:23 <b>concentration</b> 23:22 52:7 <b>concentrations</b> 20:23 <b>concern</b> 5:3 12:6 23:3,20 24:24 36:10,13 52:4 60:10,22 61:13 71:25 108:19 146:24 147:2 <b>concerned</b> 2:7,13 52:9 102:2 107:23 133:7 142:2 <b>concerning</b> 8:10 12:14 17:10	104:10 <b>concerns</b> 18:23 41:5 102:17,18 108:13,14 145:17 <b>conclude</b> 55:12 <b>conditions</b> 59:19 <b>conduct</b> 22:2 69:11 79:8 113:11 126:6 <b>conducted</b> 48:17,23 71:15 79:11 102:6 <b>conducting</b> 4:24 78:2 <b>confer</b> 115:15 <b>conference</b> 93:10 93:20 94:20 97:3 <b>confidence</b> 53:9 <b>confident</b> 5:14 <b>confirm</b> 12:17 23:5 <b>confirmed</b> 63:10 130:23 <b>conjunction</b> 84:12 <b>connected</b> 120:21 <b>conscious</b> 54:12 56:2,5 <b>consequences</b> 106:13 112:5 <b>consequently</b> 104:18 <b>consider</b> 17:24 46:23 64:4 92:8 <b>consideration</b> 18:2 97:7 <b>considered</b> 16:22 97:12 112:5 <b>considering</b> 11:8 139:18 <b>consisted</b> 135:8 <b>constable</b> 18:9 29:4 29:5 34:25 35:1 40:1,6,17,19,23 45:1 50:6 57:20 <b>Constable's</b> 40:25 <b>consult</b> 13:14,20 14:3 <b>consultation</b> 7:11	31:20 37:17,24 38:9,12,13 44:23 45:7,18 49:21 50:8 57:16 60:11 <b>consulted</b> 31:18,21 35:2,3 36:4,17 37:16,20 44:20 47:10 49:18 50:2 50:12 51:1 <b>contact</b> 73:4 76:8 93:5 94:14 107:22 <b>contacting</b> 124:3 <b>contacts</b> 58:1 <b>contained</b> 11:4 12:6,23 40:5 <b>container</b> 61:15 <b>contains</b> 9:23,25 <b>content</b> 33:12 52:24 53:1 54:24 63:14,17,18,25 104:22 109:15 123:9 <b>contents</b> 1:18 12:23 21:22 66:15 122:11 <b>context</b> 34:12 42:6 98:17 99:22,24 110:4 121:5 122:17 <b>contexts</b> 62:23 <b>contingencies</b> 69:4 <b>contingency</b> 55:11 <b>contingent</b> 77:13 <b>continue</b> 97:10 125:2 146:20 <b>continued</b> 72:12 <b>continues</b> 38:21 <b>continuing</b> 86:1 98:18 146:13 <b>contrast</b> 7:24 <b>contribute</b> 72:6 82:21,23 87:22 88:1 <b>contributed</b> 35:4 <b>contribution</b> 59:23	<b>convene</b> 94:20 102:9 <b>convened</b> 57:13,14 <b>convenient</b> 44:10 <b>convening</b> 103:24 <b>conversation</b> 32:2 33:22 52:16 54:6 54:8 74:14 91:4 115:7 142:4 <b>conversations</b> 59:17 75:18 115:9 <b>conversion</b> 130:20 130:20 <b>convey</b> 36:18 82:15 <b>cooling</b> 143:13 144:11 <b>coordinated</b> 8:17 9:8 <b>copied</b> 76:17 93:14 104:8 <b>copy</b> 27:6,9 <b>correct</b> 1:25 2:12 15:4 38:7 60:14 61:10 68:8 72:25 77:21 79:18 80:8 80:21 91:18 102:14 118:23 126:22 133:12 137:9 <b>correction</b> 114:11 <b>corresponding</b> 135:5 <b>COSHH</b> 30:4 <b>counsel</b> 128:9 <b>counter</b> 3:2 67:2,3 142:21 <b>counterproductive</b> 142:24 <b>countersigned</b> 75:12 <b>country</b> 116:15 <b>couple</b> 16:16 124:14 <b>course</b> 67:9,10,12 72:17 76:21,22
---	--	---	---	---

77:7,14 81:23	43:18	71:18	97:18 102:7	67:23 68:19 83:20
89:21 90:8,11,18	<b>critical</b> 79:15 83:17	<b>cypher</b> 65:22,24,25	106:12,15,17	<b>deploying</b> 31:3
91:8,10,13,14,14	84:1 93:23 94:14		<b>debate</b> 51:11	<b>deployment</b> 13:1
91:20,23 92:1,11	103:4,9 109:16,18	<b>D</b>	139:15,17,24	28:5 31:8 68:6
92:13,19 93:10,12	110:9	<b>D</b> 148:1	<b>debriefed</b> 107:15	<b>deployments</b> 68:16
93:17 94:4,8,9,13	<b>cross</b> 34:9	<b>d'etre</b> 69:12	108:3,11	<b>deploys</b> 30:19
95:10,15,18 96:6	<b>crunch</b> 103:7	<b>daily</b> 4:5	<b>December</b> 1:16 8:5	<b>deputy</b> 78:1
96:11,23 97:5,9	<b>CS</b> 8:23 9:21 10:3	<b>danger</b> 30:23 62:9	<b>decide</b> 46:9,11	<b>describe</b> 29:2
100:3 101:22	10:16,20 11:2,4,8	<b>dangerous</b> 43:18	<b>decided</b> 28:22 50:6	<b>described</b> 30:9 72:2
102:5 103:3,10,17	11:13,13 12:3,8	43:20	78:24	75:24 84:1 114:1
104:3,11,12,15	12:17,23,24 13:1	<b>data</b> 20:10 23:21	<b>deciding</b> 105:15	116:4
105:7 106:14	13:12 15:11 20:23	26:6,15 27:7 30:5	<b>decision</b> 14:14 16:6	<b>description</b> 92:14
107:14,20,24	20:24 23:22,23	<b>date</b> 48:6 71:7	16:10,12,23,24,25	113:25
108:5,12,15,17,20	24:1 25:23 26:4	125:25	33:17 46:6 47:2	<b>designated</b> 104:21
108:25 109:11,13	28:4 31:13,16	<b>dated</b> 1:16 12:14	50:1,10,19 51:8	<b>designed</b> 55:24
109:17,22 110:4,5	33:12 38:23,24	19:4 25:18 29:15	51:17 57:4 61:17	144:5,6
110:17 111:3,6,10	39:16,16,22 40:5	48:9 66:4,11	80:1 82:21,23	<b>desire</b> 54:25
112:4,24 119:15	42:10,10,19 43:6	77:24 87:1	104:23 105:20	<b>detail</b> 6:12 19:19
129:21 130:21,24	55:25,25 56:3	<b>dates</b> 76:9 127:17	110:23,25 111:4	58:12
131:11,12,19	60:12,20 61:9,15	<b>David</b> 18:8	114:4,5	<b>detail/content</b>
142:20 146:11,17	63:9,14,25	<b>Davies</b> 1:5,6,7,10	<b>decision-making</b>	28:20
146:23	<b>CSDC</b> 4:12,19 5:7	34:9 63:8 148:3	102:19 105:11	<b>detailed</b> 47:9,15,16
<b>courses</b> 76:5	8:7,22 9:5,11	<b>day</b> 37:22 50:15	<b>decisions</b> 29:6,25	76:19 93:25
103:25 104:1	10:21 18:12,18	51:9 64:21 83:6	<b>decisive</b> 68:17	<b>details</b> 83:21
<b>Cousen</b> 83:3	19:14 20:1 22:24	91:13 95:1,9	<b>delegated</b> 29:4,11	144:10
123:11,13 124:2,5	40:8,17 42:10,24	96:10 111:10,13	<b>delicately</b> 106:10	<b>detective</b> 117:9
<b>cover</b> 2:24 107:15	43:21 46:23 48:23	112:17 116:1	<b>deliver</b> 9:1 10:2,4,5	<b>determined</b> 31:10
108:8 110:6	59:14 60:18	131:19,19 132:13	10:22	<b>determining</b> 125:1
<b>covert</b> 30:20 69:2,6	<b>CSDC's</b> 54:25	135:12 137:3	<b>delivered</b> 74:1	127:5
<b>CQC</b> 93:11 94:7	<b>CSI</b> 12:13 25:5	143:7	81:25 87:24 91:16	<b>develop</b> 6:6 104:17
104:17 145:23	<b>CTS</b> 38:25 39:7	<b>day's</b> 83:9	137:2	112:23
<b>create</b> 81:4,18 83:5	<b>CTSFO</b> 67:16 70:7	<b>daybook</b> 75:12	<b>delivering</b> 15:8	<b>development</b> 3:9
<b>creation</b> 141:16	76:5 94:24 98:11	86:19 95:16 143:2	<b>delivery</b> 9:3 10:9	8:10,16 9:7 72:12
<b>credibility</b> 72:1	107:5 145:4,8	<b>days</b> 54:15,16	11:8 12:8 31:16	72:12 104:14
98:7,18,25,25	<b>CTSFOs</b> 75:7	75:23 80:20	38:22,24 63:19	<b>developments</b> 3:4
99:1,2,2,5,6,7,16	<b>culminating</b> 104:11	124:15 143:18	<b>demonstrations</b>	3:23 6:1,1 107:13
99:17 100:14	<b>current</b> 6:24 7:15	<b>deal</b> 71:24 77:16	4:15,22	<b>device</b> 4:16 5:8
110:13,15 112:10	72:5	85:16 106:2	<b>department</b> 2:14	10:2,8 12:15,22
<b>credible</b> 99:8,8	<b>currently</b> 2:1 30:19	121:21 126:23	21:14 135:20	14:6 15:10 16:22
100:10,12,16,18	<b>curriculum</b> 2:10	<b>dealing</b> 24:4,6,17	<b>departure</b> 83:11,12	17:15 18:11 28:5
100:19,22 103:18	132:18,20,21	26:7 44:2 77:13	<b>depend</b> 5:14	32:4 33:12 44:22
145:13	133:14,15,18,20	90:7	<b>depending</b> 92:19	45:3,4 46:16
<b>criminality</b> 2:21	133:24 134:2	<b>dealt</b> 106:4,6,21	121:16	47:20 48:15 49:24
126:24	<b>cut</b> 83:7	<b>Dear</b> 25:22	<b>depends</b> 84:4	50:11,19 51:13,25
<b>criminals</b> 31:10	<b>cycle</b> 70:22,24	<b>death</b> 78:2 95:14	<b>deployed</b> 31:13	55:5,6,15,19,24

56:4,23 57:15,17 61:20,23 63:25 64:4 <b>devices</b> 32:5 56:20 57:12 58:7 <b>devolved</b> 3:17 <b>died</b> 102:3 <b>difference</b> 144:14 <b>different</b> 9:2,4 10:24 17:20,20 18:13,14 38:2 40:9,12 59:2 63:18 68:10 77:17 86:18 106:3,5 109:2,3 124:8 129:7 130:12 135:11 144:6 <b>difficult</b> 37:3 64:24 84:4,6 114:6 <b>difficulties</b> 26:1 98:16 <b>diligence</b> 24:23 128:9 <b>directed</b> 10:19 <b>direction</b> 28:24 51:18,20 61:21 <b>directional</b> 6:10 <b>directly</b> 11:2 13:8 22:16 44:21 45:2 45:3 77:15 93:13 <b>director</b> 78:1 <b>disagree</b> 103:16 <b>disagreed</b> 103:13 103:14 <b>discharge</b> 55:24 <b>discharging</b> 39:16 55:25 <b>discounted</b> 39:6 <b>discovered</b> 60:13 61:9 63:1 <b>discovery</b> 60:19 <b>discretion</b> 104:13 <b>discuss</b> 11:11 115:16 <b>discussed</b> 11:15	18:24 63:23 80:11 104:22 119:24,25 120:3 142:5 <b>discussing</b> 93:4 118:16 119:6,10 120:18 <b>discussion</b> 21:23 22:21 29:13 50:8 52:19 54:2 59:9 107:2 115:10 120:1 141:2,20 <b>discussions</b> 139:25 140:2,4,6,8,11,12 <b>disproportionate</b> 56:8 <b>disregarding</b> 13:11 <b>distribution</b> 29:21 <b>dividing</b> 7:3 <b>division</b> 67:11 <b>document</b> 23:9,11 30:11 41:20 43:9 83:8 125:15 128:21 136:11 <b>documentation</b> 27:3 39:8 49:21 <b>documented</b> 47:9 47:10 49:19 51:2 121:13 <b>documents</b> 7:17 29:24 30:2,7,15 57:15,19 96:8 111:12 128:6 134:3,10 <b>doing</b> 6:14,15 32:13 43:22 58:20 73:13 96:20 128:7 134:8 139:2 145:12 <b>double</b> 61:14 <b>doubt</b> 82:14 108:20 136:4 145:19 <b>dozen</b> 21:16 <b>draft</b> 7:16 <b>draw</b> 142:23 <b>drawn</b> 25:12	<b>drive</b> 54:25 <b>driven</b> 111:14 <b>DSTL</b> 21:1 22:23 <b>due</b> 24:23 39:6 59:16 <b>Duggan</b> 124:3 <b>duplication</b> 87:3 <b>dust</b> 144:4 <b>duties</b> 103:5 146:13 <b>duty</b> 114:7,10,11 122:22 139:5,7 <b>dwelling</b> 60:10 <b>dynamic</b> 89:25	<b>E</b>	<b>electronically</b> 29:17 30:16 <b>element</b> 10:22 94:7 104:18 <b>elements</b> 82:24 <b>elide</b> 143:20 <b>eliding</b> 143:13 <b>else's</b> 66:6 <b>email</b> 19:4 20:6 21:17,22 25:11,17 26:21,23 27:9,19 36:23 37:12 45:10 47:6 50:16,17,21 50:24,25 51:3,5 52:22 53:16,20,23 54:7 56:9,13 59:3 91:11 92:21 93:3 93:14,25 94:16 95:5 96:4 97:3 101:18 102:24 103:8,23 104:7 107:11,23 108:2 108:15 111:9 112:16 134:11,11 140:18,23,24 141:8 <b>emails</b> 53:24 76:16 124:1 <b>emergency</b> 60:8 <b>emerging</b> 41:25 43:12,17 <b>emotions</b> 116:21,23 <b>enable</b> 20:12 93:14 <b>enabled</b> 101:11 110:21 <b>enclosures</b> 29:16 47:23,24 <b>Energy</b> 52:4 <b>enforcement</b> 24:10 <b>engaged</b> 113:10 <b>enquired</b> 23:25 <b>ensure</b> 12:18 20:18 73:3,12,18,25 <b>entered</b> 25:9 <b>enthusiasm</b> 105:8	<b>environment</b> 110:7 126:20 <b>equipment</b> 24:10 24:16 25:10 27:11 32:5 35:20,21,22 36:1,2,14 39:2,9 41:18 <b>equipments</b> 3:24 <b>eradication</b> 60:11 <b>error</b> 72:8 <b>especially</b> 89:25 106:11 108:7 112:23 115:16 <b>established</b> 7:19 24:4,7 <b>et</b> 13:24 78:22 81:21 84:6 86:19 139:5 140:3 <b>ether</b> 54:2 <b>EU</b> 26:6 27:7 <b>evaluated</b> 64:7 <b>evaluating</b> 14:10 20:1 <b>evaluation</b> 4:13 15:9,19 20:15 22:6 44:23 45:18 47:20 61:5 <b>evaluations</b> 13:23 14:6 <b>event</b> 57:7 65:12 132:13 143:7 144:16 <b>events</b> 113:25 116:13 121:15 137:17 <b>evidence</b> 34:15 40:2 53:15 64:12 76:2 77:5,22 89:16 95:12,13 104:14,16 111:11 119:25 123:20 124:14 139:16,19 140:13 141:18 143:21 147:9 <b>evident</b> 40:11
--	---	---	----------	--	--

<p><b>exact</b> 140:2  <b>exactly</b> 6:13 26:17  76:6 77:14 87:20  91:10 93:20 105:3  108:21 111:25  121:3 137:12  <b>examine</b> 14:25  35:18 102:10  <b>examined</b> 35:10  109:17  <b>example</b> 22:8 52:5  73:20 123:14  132:17 133:16,24  <b>excellent</b> 5:13 53:8  <b>excess</b> 60:11  <b>excessive</b> 21:2  <b>excessively</b> 20:23  <b>exchange</b> 22:13  26:9 27:12 38:19  141:8  <b>exchanges</b> 36:23  <b>excluded</b> 76:14  82:11  <b>executive</b> 69:5  <b>exercises</b> 137:8,10  <b>existed</b> 48:4  <b>existing</b> 29:2 71:21  72:9  <b>expand</b> 31:7  <b>expect</b> 5:15 49:7  53:11 86:4 90:2  92:16 119:12  <b>experience</b> 81:9,19  84:13 98:6,11  99:21 100:7 101:3  <b>experienced</b> 6:3  31:10  <b>expert</b> 128:5  134:14  <b>expertise</b> 52:13  <b>explain</b> 92:10  116:20 122:18  <b>explained</b> 39:25  87:22  <b>explaining</b> 128:6</p>	<p>128:19  <b>explains</b> 49:9  <b>explanation</b> 131:3  <b>explanations</b> 40:11  <b>explicitly</b> 62:19  <b>explosive</b> 10:21  <b>expulsion</b> 25:23  38:25  <b>extent</b> 4:4  <b>external</b> 30:21  94:13,13  <b>extra</b> 72:14,14,21  88:13 100:4  <b>extreme</b> 103:12  <b>eyes</b> 88:6,12</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>face</b> 10:12 35:5,25  40:11 41:1 79:12  79:12 92:19  <b>fact</b> 4:23 8:25 12:2  15:24 16:18 17:18  19:20 24:9 25:9  28:10 44:9 46:25  55:10 56:2 61:1  63:13 64:3 75:17  86:20 93:22  103:16 106:11,22  108:12 112:19,21  121:14 122:22  123:3 128:23  131:20 132:22  139:15  <b>factor</b> 36:18  <b>factors</b> 94:3  <b>fades</b> 144:1  <b>fail</b> 92:18 103:25  104:1  <b>failed</b> 90:8,22 91:2  91:7,12,17,21  94:7 101:23 104:3  104:17,18 108:16  <b>failure</b> 72:8 76:22  90:16,25 91:20  92:6,7 93:16,21</p>	<p>94:4 97:5,8 102:4  102:6,10 104:11  104:12,20 105:7  106:13 109:7  145:22 146:8,9  <b>failures</b> 77:6 112:6  120:2  <b>fair</b> 7:6 100:2 105:5  <b>fairly</b> 92:15 122:12  126:8  <b>fake</b> 15:13  <b>fall</b> 105:16,19  <b>falls</b> 126:21  <b>false</b> 126:18  <b>familiar</b> 6:17,23  8:13 38:19 80:22  130:7 137:10  <b>families</b> 142:15  <b>family</b> 118:8  <b>far</b> 2:13 7:1 20:7  23:24 44:11 46:4  54:6 72:3 77:5  102:2 133:6  <b>fast</b> 90:1  <b>fatal</b> 114:24  <b>feasible</b> 76:7  <b>feature</b> 89:6  <b>February</b> 76:23  90:19 91:6,12  93:4 95:9,17 97:5  126:2,3 146:12  <b>feedback</b> 95:6  104:10,15 105:5,9  107:17  <b>feel</b> 1:8 103:3 105:5  110:15 122:20  <b>feeling</b> 115:10  116:23 140:6  <b>feet</b> 65:11  <b>fell</b> 94:20 110:25  <b>fellow</b> 74:15  <b>felt</b> 6:9 15:18 98:13  100:4 101:25  102:25 103:4  110:23 113:22</p>	<p>122:20 138:20  140:13  <b>fence</b> 144:8  <b>fewer</b> 73:8,10  <b>filled</b> 86:16  <b>film</b> 28:5,10,12  <b>final</b> 124:8  <b>finalising</b> 26:1  <b>finance</b> 3:4  <b>find</b> 14:4 15:6 30:7  53:20 103:17  114:25  <b>finding</b> 91:23,24  <b>fine</b> 65:1,10  <b>finger</b> 23:11  <b>finish</b> 36:12  <b>finished</b> 54:12  134:4 146:4  <b>fire</b> 82:22 93:12  108:7 145:23  <b>firearms</b> 2:11,25  6:4,8,18 7:21 8:6  14:14 15:13 16:6  16:23 19:22 23:10  25:23 26:19 28:8  28:11,21,23 29:6  29:11 30:19 33:16  37:22 38:4 39:12  46:6,9,11,13  54:13 56:11,16,25  57:13,14 59:10,16  59:25 60:9 67:7  70:11,13,17,18  71:9,12 73:23  76:21 77:18 78:6  78:14,20,24 79:2  79:24 80:6,13  81:1,3 82:16 83:4  84:11,12 85:4  103:18,25 104:3  112:16 113:9  116:14 119:19  120:17 124:23  125:2,11 126:16  127:6 129:23</p>	<p>132:18,20 141:17  142:13 145:15  <b>fired</b> 114:25 115:1  <b>firing</b> 5:3  <b>first</b> 8:1 14:25  17:17 19:20 21:9  33:5,8 46:18,19  52:22,25 57:11  60:3,18 67:8,9  89:19 90:4 104:15  113:15 120:3  121:3 122:4  124:12 126:18  130:17,18 136:3  136:14 140:23,24  143:24  <b>firstly</b> 14:2,5 20:6  79:7 80:18 124:22  128:4  <b>fit</b> 11:9 21:8 74:18  <b>fits</b> 28:6  <b>Fitton</b> 127:18  <b>five</b> 44:13 68:22  118:2  <b>flaw</b> 49:13  <b>flexible</b> 31:3  <b>focus</b> 49:9  <b>focused</b> 31:9 62:7  <b>follow</b> 17:25 37:1  39:24 71:19  130:16  <b>followed</b> 55:14  <b>following</b> 20:13  31:18 35:2 36:4  36:16 60:9,11  71:13,19,20 83:6  83:25 84:23  115:24  <b>follows</b> 80:18  <b>foot</b> 12:12 25:17  29:15 93:4  <b>force</b> 14:23 28:23  29:6 30:21 38:20  49:24 71:12 73:24  91:7 98:20 110:10</p>
--	--	---	---	---

126:2 127:10 129:11,14 146:23 <b>forces</b> 74:23 75:1 146:7,8,10 <b>forgive</b> 119:22 125:12 126:25 <b>form</b> 79:2 80:3,6,9 80:16 81:1,4,12 81:15,19 82:8,10 83:3 84:9,14 85:1 88:7 132:12 <b>format</b> 116:5 <b>formatting</b> 28:19 <b>former</b> 18:8 <b>formulated</b> 122:12 <b>fortnight</b> 91:17 93:16 95:13,17 96:9,14,16 111:19 <b>forward</b> 8:9 15:20 23:12 60:1,6 77:15 113:21 <b>forwards</b> 18:7 22:25 50:15 <b>found</b> 41:19 109:18 109:21 <b>four</b> 52:23 <b>fourth</b> 95:5 <b>fourthly</b> 78:21 <b>FPG</b> 23:19 48:12 48:14,15 54:14 <b>fragmentation</b> 21:2 39:5 <b>free</b> 1:8 64:13 65:16 147:9 <b>friction</b> 75:22 <b>Friday</b> 1:1 83:21 83:23 115:24 147:12 <b>front</b> 1:11 10:24 49:14 66:2 84:7 107:13 135:25 <b>FTU</b> 72:24 105:16 105:19 <b>FUG</b> 4:11 <b>full</b> 36:17 42:6	83:17 88:25 137:3 143:18 <b>fuller</b> 144:11 <b>fully</b> 6:16 26:17 107:15 108:3 <b>function</b> 19:10 67:1 67:5 68:10 69:12 105:15 <b>functions</b> 3:3 <b>fundamentally</b> 63:19 103:13 <b>further</b> 6:7 60:15 83:23 88:12 93:11 99:14 104:21 105:17 108:4 110:19 131:10 137:15 144:20 147:5 <b>future</b> 93:11,20 94:22 106:8,14 107:3,5 108:12 109:20 142:12	18:2 20:11,13 23:25 64:23 88:12 95:10 97:7,21 111:14 114:4 117:21 121:18 122:25 137:25 138:21 139:19 143:15 <b>given</b> 3:14,15 7:17 12:7 15:15,25 16:19 18:18 22:4 37:4 42:22 45:6 50:24 53:15 57:9 58:11 62:4,18,22 77:8 78:5,8 79:2,5 80:6 81:1 86:9 97:3 111:21 113:1 113:22 120:5,12 122:5,8 123:4,15 123:17,19 138:6 140:10 141:3,5 143:8,17 <b>gives</b> 98:7,24 <b>giving</b> 72:14 87:8 <b>Glock</b> 9:24,25 10:5 <b>GMP</b> 2:4,14 4:12 18:20 30:19 37:15 38:17 44:6 55:6 66:24 74:11 77:12 91:19 103:10,22 106:1 107:13 116:4,9 123:1 130:23 132:20 137:6 <b>go</b> 4:2 8:9 14:15 22:1,22 23:11 35:22 37:6,25 42:3,14 44:9 45:21 50:15 51:16 52:3 60:1,6 64:13 66:10 82:5 84:16 95:22 103:6 104:1 105:22 107:6,9 114:16 136:16 137:8 139:3 142:9	147:9 <b>goes</b> 31:5 61:17 126:11,14 <b>going</b> 4:18 8:11 18:25 24:14 28:3 31:23 37:1 49:17 50:4,10 54:14 76:12,19 91:13 95:2 96:5 110:3 111:9 116:21 117:19 118:1 124:2,17 126:1 128:8,22 130:15 131:23 132:1,7 134:23 138:21 144:8,20 <b>gold</b> 47:11 79:13 <b>good</b> 1:7 22:3,11 36:19 48:18 51:2 63:14 84:16 96:17 96:18 108:9 122:20 143:10 <b>government</b> 74:24 <b>grading</b> 86:14 <b>Graham</b> 19:5 <b>Grainger</b> 65:7 95:14 97:18 102:3 102:8 106:12,16 106:18 <b>Grainger's</b> 78:2 128:3 <b>grammar</b> 28:19 50:14 <b>grams</b> 12:6 55:19 55:24,25 56:4 60:14 61:3,18,19 61:21 63:1 64:2 <b>Granby</b> 83:2 <b>granted</b> 62:22 68:7 <b>grants</b> 40:20 <b>grave</b> 145:17 <b>great</b> 6:12 71:24 108:19 <b>greater</b> 2:22,24 16:2 18:12 34:20	43:14 67:7 70:21 74:21 75:6 111:14 141:17 146:8 <b>grenade</b> 10:25 20:10 21:2 25:23 26:5,15 <b>ground</b> 134:3 <b>grounds</b> 55:10 <b>group</b> 14:14 15:13 16:6,24,25 23:10 26:19 28:8,11,21 28:22 29:10,11 33:17 37:22 38:4 46:6,9,11,13 54:13 56:11,17 57:13,14 59:10,16 59:22,25 <b>guidance</b> 2:10 10:15 11:18,20 12:7,8 28:24 <b>gun</b> 82:22 114:25
	<b>G</b>			<b>H</b>
	<b>G1</b> 130:17 131:4 <b>G2</b> 125:13 <b>G2/1146</b> 125:14 <b>Gail</b> 128:3 <b>gap</b> 54:19 <b>gas</b> 40:5 <b>gathered</b> 114:18 <b>general</b> 31:9 69:24 70:3,13 140:6 145:22 <b>generality</b> 4:9 <b>generally</b> 69:20,21 106:7 132:14 140:12 143:25 <b>geographically</b> 83:16 <b>getting</b> 26:24 112:1 134:12 <b>Giladi</b> 101:2,4 <b>gist</b> 81:11 <b>give</b> 11:25 15:3			<b>habitually</b> 79:11 86:16 <b>Hadfield-Grainger</b> 128:3 <b>half</b> 19:9 21:16 <b>halfway</b> 5:6 <b>Hananya</b> 26:3 <b>hand</b> 130:17 <b>handheld</b> 10:20,23 63:15 <b>handling</b> 39:9 <b>handover</b> 19:24 85:22 <b>hang</b> 125:20 127:5 <b>happen</b> 3:16 16:3 74:13 75:23 77:9 89:23 116:14 <b>happened</b> 15:24 72:20 77:2 106:25 112:21 114:22 115:16 116:25 122:25 123:24

<b>happens</b> 104:2	4:23 5:9,12,16 6:2	<b>ideally</b> 49:12	<b>included</b> 36:20	144:9,15
<b>happily</b> 130:25	11:15,23,24 15:8	<b>identification</b>	79:19 82:10,12	<b>initially</b> 61:3
145:16,18	18:18 19:25 21:25	61:20	<b>including</b> 78:21	<b>initiated</b> 35:15
<b>happy</b> 81:18 91:25	25:17 27:1,23	<b>identified</b> 39:5	79:3 100:8 127:9	<b>injury</b> 20:18,22
92:9	28:14 32:2,15	49:14	<b>incorrect</b> 60:12	21:1 48:24,24,25
<b>hard</b> 105:6	33:23 34:1 36:24	<b>identifies</b> 48:23	61:1,1,9	49:1
<b>Hart</b> 19:5 20:9	37:18 41:9,21	<b>identify</b> 31:16	<b>increase</b> 70:5	<b>input</b> 21:4 28:17
<b>Harte</b> 21:25	45:14 47:6 50:25	37:25 49:1	<b>independence</b>	<b>Inquiry</b> 1:11 7:15
<b>Harwell</b> 52:5	53:8 54:14 55:4	<b>Ignore</b> 66:10	13:22	65:21 120:1 128:9
<b>head</b> 2:14,18 4:19	56:14 58:1,12,16	<b>immediate</b> 31:14	<b>independent</b> 14:5	147:15
19:9 21:14 75:3,9	58:20 59:18	127:15,16 146:19	52:5,6,8,10	<b>inside</b> 9:14,20
77:12	<b>Holmes'</b> 34:14	<b>immediately</b> 77:7,8	<b>independently</b>	<b>insight</b> 99:14
<b>Headquarters</b> 67:4	<b>Home</b> 7:11,18,20	94:15 146:11,13	102:6	<b>insights</b> 110:19
<b>health</b> 26:1 37:15	9:22 12:25 13:13	<b>impact</b> 97:12	<b>indicated</b> 71:23	112:11
37:17,21 39:10	21:12 22:9 34:19	<b>impacted</b> 97:9	76:1 127:22	<b>insofar</b> 31:5
<b>hear</b> 58:15 89:19	<b>honest</b> 36:19 59:20	<b>implement</b> 16:24	<b>indicates</b> 108:17	<b>inspection</b> 102:4
<b>heard</b> 5:12 6:12	105:13	25:22 27:11	<b>individual</b> 4:3 6:2	<b>inspector</b> 2:2,4,19
18:8 52:10 73:1	<b>hopefully</b> 20:13	<b>import</b> 25:10	119:11 124:22	3:12,21 4:23 5:9,9
77:5 82:25 89:16	88:3 128:5	<b>important</b> 36:11,18	125:1 127:4,6	5:12,16 6:2,3,5,8
95:13 109:1	<b>HOSDB</b> 11:17,18	82:15 89:14 91:19	<b>individuals</b> 3:6	11:15,23,24 15:8
111:11 119:25	11:21 12:4,7,10	91:22 94:24	39:4	16:8 17:7 19:7,25
<b>held</b> 97:4,4 109:3	15:11 18:21 19:6	101:25 108:14	<b>influenced</b> 122:13	21:25 25:17 27:1
<b>helicopters</b> 73:21	31:18,20 32:3,4	<b>importer</b> 39:1	123:5	27:20,23 28:14
73:22	32:23 33:6,13,19	<b>importers</b> 24:12	<b>info</b> 47:12	32:2,15 33:23
<b>help</b> 1:21 30:14	34:6,7 35:3,6,10	<b>impression</b> 11:22	<b>inform</b> 49:25	34:1 36:24 37:18
32:25 34:22 35:7	35:18,23 36:5,14	11:25	<b>information</b> 20:11	38:11 40:16,22,25
37:9 40:15 70:20	36:14,17,24 41:5	<b>improper</b> 115:13	22:5 24:8 27:4,9	41:9,21 44:17
120:7 128:4,4,11	44:20,21 45:2	122:10,12	30:5 37:4 50:5	45:14 47:6 50:25
130:11,15 131:15	47:4,9 49:18,22	<b>improve</b> 44:2	51:24 77:25 78:5	53:8 54:14 55:4
131:17 133:21	49:25 50:2,2,12	<b>improving</b> 75:19	78:5,7 80:2 82:4	56:14 58:1,12,16
<b>helpful</b> 130:2 132:7	50:13,16 51:1,10	<b>inaccurate</b> 32:1	84:7 85:8,19	58:20 59:18 66:23
<b>helpfully</b> 135:22	51:16 52:12 56:6	<b>inapplicable</b> 17:13	86:12,25 87:2,7	67:6 69:25 70:1
<b>helps</b> 87:16	57:16,24 58:2,4	17:21	87:16 89:9 97:17	73:1 74:7,16 75:2
<b>high</b> 4:9 5:15 20:23	63:10	<b>incapacitant</b> 9:21	100:5 102:25	75:10,10,12,13,22
53:9,11 67:2	<b>host</b> 69:16,23 84:5	10:3,17,20 11:13	109:7,8 134:12	76:11,11,14 93:13
<b>higher</b> 63:14 108:6	<b>hour</b> 118:1	39:17	144:7	95:15,22 96:10,19
112:24 126:23	<b>hours</b> 73:4,8,10	<b>incapacitation</b>	<b>information/intel...</b>	97:15,16 98:23
<b>highlight</b> 28:5	122:1 139:7	31:15	78:16,18 79:1,4	100:8,9 101:6
<b>hindsight</b> 9:17	<b>house</b> 35:22	<b>incident</b> 113:10	84:15,25 88:25	104:7,8,22 105:20
<b>Hmm</b> 32:11	<b>hundreds</b> 15:25	118:16 119:6	89:14,18,25	105:22 107:12
<b>hold</b> 88:20 93:20	16:15	123:5 139:7	<b>informed</b> 50:3,13	109:17 111:18
96:3 108:20	<b>I</b>	<b>incidents</b> 109:20	57:3 90:8	112:5 117:9
<b>holding</b> 2:1 93:10	<b>idea</b> 5:7 20:14	<b>include</b> 8:7 73:2	<b>initial</b> 5:7 67:9	124:19,20 127:18
95:25 96:1	117:21	78:7 118:19 119:8	94:22 115:23	127:19 129:7
<b>Holmes</b> 3:12,21		119:15	138:1 143:25	145:17

<b>inspector-wise</b> 127:17	42:24	41:4 54:4 58:17	139:21,23	87:20 92:12 98:6
<b>inspectors</b> 3:11,17 4:8 6:4 74:13	<b>introducing</b> 26:5	83:18 84:5 93:23	<b>keep</b> 23:11 71:2 134:9	98:12 99:15
<b>instance</b> 126:18	<b>introduction</b> 26:15 28:25 40:17 48:15	94:14 103:9 106:3	<b>kept</b> 117:3	110:20 112:12
<b>instructed</b> 134:14	50:19 55:1,5,6	106:5,24 107:14	<b>key</b> 87:12	124:7 134:19
<b>instruction</b> 137:25 138:6	57:17 59:13 62:7	107:16 108:3,10	<b>killed</b> 117:1	<b>known</b> 42:23 75:7 79:7 138:11
<b>instructor</b> 70:17 71:9 76:22 108:2 113:9 135:9 136:24	<b>investigated</b> 60:23 127:3 147:1	108:16,18,22,24	<b>kind</b> 38:12 74:15 83:14 88:8 99:24	<b>knows</b> 95:12
<b>Instructor's</b> 112:16	<b>investigation</b> 78:2 81:7,17 88:16 143:25	109:2,16,18,20	110:7 112:8,22 134:10	<hr/> <b>L</b> <hr/>
<b>instructors</b> 70:19 71:25 76:25 77:11 91:5 92:1,12 133:17	<b>investigators</b> 143:17 144:7,16	110:9 119:14	<b>kindly</b> 7:14	<b>lab</b> 52:5,7
<b>integrity</b> 25:1	<b>invited</b> 13:22 75:4	121:1 139:4	<b>kinds</b> 22:10 106:9 108:24 116:20,22	<b>lack</b> 105:7
<b>intelligence</b> 78:6,22 80:3,5,22 81:6,9 81:11,16 82:1,7 82:16 83:19,23 84:20 85:8,19 86:8,13,14 87:7 87:17,18,21 88:2 88:15,16,19 89:3 89:4,10	<b>involved</b> 2:23 14:2 22:5 68:13 74:5 85:5,14 88:11 100:23 106:12 115:17,20,21,25 116:3 118:17 119:7 137:22 141:15	142:11 145:14	<b>knew</b> 17:2,11 18:20 33:9,22 34:11,18 35:10 36:13 41:4 41:9	<b>laid</b> 33:13
<b>intelligence/infor...</b> 85:12	<b>involvement</b> 4:10 74:6 102:7 106:15 106:17 115:18	<b>item</b> 29:8 39:16 40:10 60:6	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>language</b> 74:15
<b>intend</b> 28:4	<b>IPCC</b> 78:1 116:4 134:14 139:20 140:19 142:1,10 143:16	<b>items</b> 29:21 47:23 59:13	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>large</b> 74:22 86:24
<b>intended</b> 10:23	<b>Ireland</b> 146:16	<b>J</b>	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>lasted</b> 83:1
<b>intention</b> 10:2,4,5 14:13 18:16	<b>irritant</b> 8:24 10:16 10:17 12:24 42:19 52:8 60:11,12,20 61:9	<b>J3</b> 93:5	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>lasting</b> 60:17
<b>interception</b> 49:6	<b>irritants</b> 60:16	<b>Jack</b> 26:3	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>lastly</b> 114:7
<b>interest</b> 96:21	<b>issue</b> 17:14 18:2 21:9 32:7 35:13 35:16 42:23 47:4 55:21 58:13,15 63:11 74:7 75:10 75:21,25 103:4 105:15,17 138:17 141:17,23	<b>January</b> 19:4 48:9 90:11	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>late</b> 146:12
<b>internal</b> 19:11	<b>issues</b> 18:23 21:11 22:9 26:2 37:12	<b>Jason</b> 1:10 65:20	<b>know</b> 4:17 9:16,17 10:14 14:22 15:2 15:20 17:2 18:20 22:19 24:3,5 32:3 35:5,21 37:8 38:10 41:5 43:5 44:5 45:6,9,12 48:2,12,16 49:13 50:14 51:9,10,16 53:3 54:11 56:1 57:2 61:18 64:17 64:22 72:4 76:20 76:23 77:8 83:21 83:21 85:11,18 86:11 91:19 93:19 95:12 97:6,17 99:6 102:3 105:1 105:3 111:18 113:8 115:22 116:17 117:5,7,18 124:1 126:5 139:6 139:10	<b>latest</b> 90:2
<b>interpretation</b> 42:12 105:9		<b>jigsaw</b> 87:13	<b>knowledge</b> 1:19 6:20 7:1,3 13:10 13:12 17:9 22:20 36:22 37:16 49:16 50:18,22 52:25 58:11 66:16 79:23	<b>law</b> 24:10
<b>interrupt</b> 120:9		<b>job</b> 5:14 6:5 97:14 97:14,16 115:11		<b>Lawler</b> 75:3,10,11 75:13,17 76:18 101:6 104:8 105:23
<b>interview</b> 141:19		<b>John</b> 19:5		<b>Lawler's</b> 75:12
<b>interviewed</b> 139:20		<b>join</b> 1:21 66:18		<b>lead</b> 75:2 76:11 146:24
<b>introduce</b> 9:24 36:1 36:3 44:24 45:19 46:15 50:19 56:7		<b>joined</b> 19:15,22 21:14 25:13 67:12		<b>leadership</b> 5:22,23 5:25
<b>introduced</b> 4:19		<b>Joint</b> 146:16		<b>learn</b> 112:23
		<b>judgment</b> 84:8 100:5		<b>learning</b> 113:23 135:11
		<b>July</b> 2:16 19:15,22 28:9 48:10 57:12 59:11,21,22 77:24		<b>leave</b> 100:20 107:14 114:13 137:14
		<b>jump</b> 22:25 73:21 135:2		<b>leaving</b> 139:9
		<b>June</b> 4:11,25 13:15 18:7 26:19 27:13 27:23 45:10 50:16 54:12 59:3		<b>led</b> 11:5 55:13 60:19 61:20
		<b>justifiable</b> 83:13		<b>left</b> 53:22 83:5 107:24 118:11
		<b>justifications</b> 62:11		<b>left-hand</b> 65:21 125:25
		<hr/> <b>K</b> <hr/>		<b>lesser</b> 142:18
		<b>keen</b> 27:10 139:20		<b>let's</b> 16:10,10 117:19

<b>lethal</b> 2:11 6:18 8:6	139:4	<b>manage</b> 28:10 70:3	145:17	<b>medical</b> 13:23 14:6
<b>letter</b> 12:13 23:3,16	<b>longer</b> 112:23	70:3 75:1	<b>Marcus</b> 73:1 74:7	21:3 22:7,23
23:20 24:3,24	122:2 142:23	<b>managed</b> 25:25	75:13 76:14 93:14	52:12
26:3 27:6 30:3	<b>look</b> 1:14 5:5 8:1	70:14,15	94:17 100:8,9	<b>medically</b> 20:25
52:4	11:11 12:11 20:15	<b>management</b> 3:4,5	105:24	<b>meeting</b> 16:8,9 18:7
<b>level</b> 4:9 19:19	26:22 32:17 34:25	4:7	<b>Marie</b> 38:3,7	26:24 27:14,17,24
31:17,19 37:16	42:11 43:20 47:5	<b>manager</b> 2:5,6	<b>Mark</b> 65:14,15	27:25 28:11 29:14
75:25 103:17	48:7,19 51:25	37:21 70:18 75:17	134:12 148:6	33:18 44:21,24
108:7,18 113:1	52:17,20 66:3	105:2 118:25	<b>MASTS</b> 30:20,25	45:19,23 59:23
<b>licensed</b> 11:13	86:7 92:21 97:24	119:3,9,13 124:10	49:7 67:19,21,24	60:3,8 78:15,25
<b>lie</b> 92:16	98:2 99:13 103:19	124:12,12 125:6	68:24 69:1,10,15	79:8,9 80:10,11
<b>life</b> 109:19	104:5 121:23	127:13,15,16	128:13,17 130:20	81:2,22,24 82:25
<b>life-threatening</b>	134:5 135:5	138:7 143:23	135:6	83:17 84:10,10,17
113:10	137:12	<b>managers</b> 127:7	<b>match</b> 74:11,18	85:15 87:2 88:11
<b>light</b> 51:8 97:8	<b>looked</b> 18:5 25:11	<b>managing</b> 2:20	<b>material</b> 128:7	88:24 89:21 102:9
106:11 112:15	26:4 36:23 41:19	<b>Manchester</b> 2:22	131:1 133:13	116:8,11 117:3
<b>limitations</b> 57:3	42:21 43:5 45:6	2:25 15:16 16:2	134:13,20	119:18 120:1,17
<b>limited</b> 60:16 107:3	64:5 128:19	18:12 43:14 67:7	<b>materials</b> 132:2	120:20 123:11
107:6	131:14 134:9,20	70:21 74:22 75:6	<b>matrix</b> 136:12	138:15 139:12
<b>limits</b> 12:3 15:11	<b>looking</b> 10:1 31:24	111:14 141:16,17	<b>matter</b> 26:2,5,14	140:20 141:2,7,10
33:15 56:5 63:9	33:11 41:17 51:24	146:9	27:2 50:4 59:2	141:25 142:3
<b>line</b> 10:24 12:9	73:6 108:1 121:21	<b>manner</b> 5:17 53:13	60:23 106:2 142:8	<b>meetings</b> 74:25
15:11 32:23 95:5	125:22 127:4	140:9 141:5	144:10	75:4 77:19 88:5
105:2 124:10,12	133:10	<b>manual</b> 10:15 12:7	<b>matters</b> 28:23 29:7	<b>member</b> 67:2
124:12 125:6	<b>looks</b> 27:24	<b>manufactured</b> 61:4	54:9 58:18	106:14 114:13
127:7,13,15,16	<b>lost</b> 53:18 54:21	<b>manufacturer</b>	<b>maximum</b> 56:3	116:25 119:1
<b>list</b> 24:17,20,21,25	<b>lot</b> 19:18 104:2	23:16 55:18 60:12	<b>mean</b> 2:9 5:1 7:10	145:13
24:25 38:1 47:24	<b>lots</b> 43:17	60:19 61:13 62:25	10:8,10 14:16,21	<b>members</b> 49:10
103:10	<b>low</b> 92:8,15	63:23	18:16 22:18 37:18	81:7 88:15 96:21
<b>listed</b> 135:9	<b>lunch</b> 64:17,19	<b>manufacturers</b>	45:3,5 49:20,23	115:8 116:9
<b>lists</b> 135:10	<b>Luncheon</b> 65:4	15:10 63:25	64:18 82:19 99:7	<b>memory</b> 17:23
<b>little</b> 22:25 64:24		<b>manufacturers'</b>	110:8,8 139:6	139:19,25 143:9
112:23	<b>M</b>	30:3 52:2	141:1,22 145:25	144:1
<b>live</b> 58:7 93:12	<b>ma'am</b> 145:4,9,13	<b>March</b> 12:14 23:3	<b>meaning</b> 35:2	<b>mention</b> 30:6 79:17
108:7 145:23	145:21 146:2,15	66:4 67:5 68:24	56:19 68:6	<b>mentioned</b> 10:16
<b>load</b> 60:14 61:11	146:21 147:2	69:24 78:7 90:12	<b>means</b> 7:5 31:3	35:25 64:25 87:24
<b>loaded</b> 60:19	<b>main</b> 20:15,17 87:6	103:8 104:8	90:19	<b>met</b> 59:25 93:6,21
<b>loading</b> 60:12 61:1	135:8	109:22,24 111:4,6	<b>meant</b> 74:25	95:1 96:4 104:16
61:9	<b>maintaining</b> 2:23	114:8,12 115:24	<b>measured</b> 20:20	105:25 107:11
<b>logistics</b> 139:14	3:6	116:8 117:10	<b>mechanism</b> 9:2	109:2,3 137:22
<b>London</b> 70:6 76:25	<b>majority</b> 116:24	118:12 119:22	76:6 124:22 125:1	<b>method</b> 31:16
146:6	<b>maker</b> 114:5	128:13 129:12	125:4 126:10,15	63:19
<b>long</b> 32:9 103:10	<b>making</b> 39:20 80:1	131:5 137:18	127:4,7	<b>methodical</b> 145:14
108:11 117:19	98:9 110:16,23	138:11 142:20	<b>mechanisms</b> 21:1	<b>methods</b> 12:9
128:2 137:11	<b>man</b> 113:9	143:2,3,3,3,3,7	112:1	<b>metropolitan</b> 74:22



76:9 77:11 91:4 98:10 103:1,2 108:2 146:5 <b>micron</b> 23:17 27:5 27:7 30:4 <b>micronised</b> 11:4 <b>mid</b> 145:17 <b>military</b> 24:11 30:9 <b>millions</b> 74:21 <b>mind</b> 20:2 34:5 35:9 55:23 56:25 71:8 138:12 <b>mindful</b> 56:6 <b>mine</b> 102:19,20 <b>minimise</b> 20:18 <b>minimum</b> 30:23 <b>minute</b> 53:2 61:6 <b>minutes</b> 38:2 44:13 63:10 65:8 83:2 117:22,24 118:1,2 120:20 <b>misdescribed</b> 36:9 88:21 <b>mislead</b> 18:16 <b>misleads</b> 42:4 <b>misled</b> 18:10 37:2,4 <b>misses</b> 65:8 <b>mistake</b> 56:13 <b>mistakes</b> 108:10 110:7 <b>misunderstood</b> 141:9 <b>mix</b> 106:13 <b>mixture</b> 52:11 <b>mobilisation</b> 3:2 <b>mode</b> 18:14 <b>model</b> 86:14 <b>modification</b> 29:1 <b>modules</b> 133:24 <b>Molloy</b> 77:25 78:4 134:13 <b>moment</b> 7:8 40:1 42:21 44:10 65:7 66:25 76:20 84:23 95:3 103:19 132:8	134:24 136:4 139:9 <b>monitor</b> 41:25 43:12 <b>month</b> 27:13 71:7 80:20 <b>months</b> 16:16 20:3 22:18 52:23 <b>morning</b> 1:7 5:13 34:17 44:12 83:6 83:23,25 <b>move</b> 25:15 66:6 107:4 124:8 130:3 132:5 <b>moved</b> 6:7 106:25 <b>movement</b> 107:15 108:8 110:6 <b>moving</b> 90:1,7 94:10 129:19 132:14 <b>MP5</b> 9:23 10:4 <b>MPS</b> 67:17 74:4 76:5 90:9,18 101:11 105:6 <b>munition</b> 57:1 59:14 <b>munitions</b> 59:14 68:14,19	81:14,22,23,24 82:3,5 83:16 84:22 86:17 88:4 89:3 91:24 99:1 100:6 101:2 102:20,23 108:1 109:10,14 110:8 113:16 114:3 122:17 133:20,21 144:2 <b>necessary</b> 14:1 15:23 35:18 40:4 40:7,18,20,23 42:18 57:6,8 58:25 65:23 73:19 84:2 103:23 <b>need</b> 6:9 12:9 20:14 20:25 21:7,8,12 22:5,5,15,22 28:7 36:25 38:23 43:19 51:22,22 52:17 56:25 58:23 79:25 81:6 106:4 128:18 <b>needed</b> 7:24 18:23 21:20 36:14,18 41:10 57:21 97:4 103:16 106:6,10 <b>needing</b> 95:22 <b>needs</b> 14:3 22:7,7 49:22 <b>negative</b> 45:13 59:1 59:5 <b>negotiations</b> 116:3 <b>neither</b> 29:20 40:10 40:24 <b>nervous</b> 140:7,13 <b>network</b> 70:7 85:3 88:8 <b>never</b> 50:22 52:10 53:22 79:24 107:5 138:12 <b>new</b> 8:22 9:7,9,11 9:18,21 10:9,9 11:6,9 13:19 17:19,22,24 18:4	22:15 29:1 41:17 42:11,17 43:3,13 43:20 44:1 46:22 46:24 48:15 64:7 <b>news</b> 106:20 107:21 <b>night</b> 34:16 47:5 50:25 115:23 122:5,8 123:21 138:24 139:1 142:23 143:16 144:5 <b>noise</b> 21:2 <b>non-compliance</b> 40:12 41:1 <b>non-operational</b> 106:1 <b>norm</b> 83:11,12 <b>normal</b> 101:23 102:8,9 <b>normally</b> 8:18 78:18,19 <b>Northern</b> 146:16 <b>note</b> 75:11 95:16 96:9 105:5 128:19 128:20 138:23 <b>notebook</b> 143:1 <b>notes</b> 86:18 91:10 91:14,14 108:21 108:25 109:11,13 109:17,22 111:3,6 111:10,19,21,24 112:1,4 146:11 <b>noticed</b> 44:1 <b>notified</b> 76:21 77:7 104:23 <b>November</b> 19:23 107:20 131:12 135:6 <b>NPIA</b> 38:15,17 <b>number</b> 5:23 24:10 31:7 38:17 70:2 73:3 74:10 77:19 106:3,5 109:2 126:13 128:24 <b>numbers</b> 136:12	<b>Nutter</b> 65:14,15,17 65:20 92:23 104:22 107:12 118:7 123:2 128:2 145:2 147:8 148:6
	<b>N</b>		<b>O</b>	
	<b>N</b> 148:1 <b>name</b> 1:10,15 65:20 66:4 99:6 113:5 118:7 <b>names</b> 65:24 <b>national</b> 2:9 3:2 7:8 13:2 67:3 132:18 132:19,21 133:14 <b>nationally</b> 66:25 67:1 70:7 <b>natural</b> 35:20 <b>nature</b> 5:20 38:10 <b>near</b> 108:12 <b>necessarily</b> 46:23 69:14 72:17 81:6		<b>Oakes</b> 127:19 <b>object</b> 9:20 10:7,20 40:4 <b>objective</b> 109:7 <b>obligation</b> 43:11 <b>observations</b> 125:5 <b>obtain</b> 13:20 <b>obtained</b> 95:15 96:10 <b>obtaining</b> 80:23 <b>obvious</b> 10:7,12 34:5 114:23 118:17 <b>obviously</b> 5:23 6:12 7:18,22 15:8 38:3 48:3 50:7 53:19 59:1 71:18 74:18 108:6 116:13 123:14 129:22 134:18 136:19 <b>occasions</b> 74:10 89:24 <b>occupational</b> 15:7 72:6 <b>occur</b> 63:13,20 64:8 <b>occurred</b> 31:20 77:6 96:25 97:1 125:6 <b>occurs</b> 121:16 <b>October</b> 19:23 38:6 57:13,14 59:25 <b>OFC</b> 84:20 87:24 88:1 97:11 146:14 <b>offer</b> 88:6,12 107:19 108:4 <b>offered</b> 108:12 <b>offering</b> 103:3	

<b>office</b> 7:11,18,20 12:25 21:13 22:9 34:19 54:11,17 92:10 <b>officer</b> 5:13 10:23 22:1 29:9 53:8 59:22 71:11 74:16 92:1,3,5,9,20 96:5 96:7 103:1,4,11 103:18 104:3,16 106:23 107:11 110:6 115:1 116:18,20 117:6 123:16,20 124:3 124:23 125:2,9 126:16,19 127:6 145:15 <b>officer's</b> 92:14 126:15 <b>officers</b> 30:20 31:4 31:11 38:17,19 41:17 43:11 48:24 48:25 49:10 65:23 68:7 69:3 70:9 73:3 74:4,23 75:6 78:22 79:3 80:7 80:13 81:1,7 82:16 92:16 98:22 100:24 102:13 103:25 107:24 108:10 115:19,22 116:15 117:8 121:6,10,13 122:19 129:12 132:23 133:10 138:12,20 139:18 139:21 141:3,18 141:19 142:13 145:23 146:7 <b>official</b> 24:18 125:4 <b>offline</b> 146:25 <b>Oh</b> 38:7 <b>okay</b> 66:1 83:10 85:17 86:3,15 89:22 92:24 95:4	100:19 102:16 103:20 118:8,9,14 120:23 124:14,18 125:22 130:10 131:13 133:6 134:22 135:4 <b>old</b> 126:7 <b>Olympics</b> 70:6 74:11 146:6 <b>omission</b> 48:3 <b>once</b> 7:19 135:9 <b>oncoming</b> 85:25 <b>ones</b> 24:17 38:20 61:5 136:5 <b>ongoing</b> 83:20 <b>open</b> 1:13 66:2 121:19 <b>Openshaw</b> 4:15 111:12 <b>operates</b> 39:7 <b>operating</b> 3:22 128:24 <b>operation</b> 18:14 60:9 61:2 69:6,18 78:14,19,25 80:19 83:8,9,20 86:9 109:24 115:11,17 115:20 118:17 119:7 122:15 146:6 <b>operational</b> 2:19,20 20:16 22:6 41:17 43:12,17 44:1 72:7 75:2 84:12 85:4 129:23 <b>operationally</b> 5:8 <b>operations</b> 2:7 3:1 3:21 4:7 5:4,10 6:9 30:21,22 31:9 67:6,24 68:1 69:25 83:15 88:10 90:1 106:9,15,21 107:3 110:10 <b>operator</b> 48:24 <b>opinion</b> 102:21	142:14 144:2 146:21 <b>opportunity</b> 27:11 113:1 120:5 121:18 <b>opposed</b> 123:9 <b>ops</b> 6:5 <b>option</b> 5:2 9:1 15:7 33:16 55:7 143:22 <b>order</b> 2:11 31:11 57:11 63:17 82:21 134:10 <b>orders</b> 74:12 <b>ordinarily</b> 146:18 <b>ordinary</b> 84:2 <b>organisation</b> 116:12 <b>organised</b> 70:13,15 <b>organising</b> 139:14 <b>original</b> 12:5 27:9 134:14 <b>originators</b> 88:19 <b>ought</b> 77:5,6 <b>outcome</b> 4:17 16:9 76:20 <b>outcomes</b> 31:1,2 <b>outside</b> 104:23,25 <b>outsiders</b> 122:13,14 <b>overloaded</b> 105:10 <b>overnight</b> 34:15 <b>overseas</b> 54:15 <b>overseen</b> 5:8 <b>overstepping</b> 73:3 <b>owned</b> 79:4 85:10 <b>owns</b> 84:25	<b>page</b> 1:13 12:12,21 25:18 26:23,23 29:15 32:18 39:3 41:20 48:19,20 89:9 92:25 93:4 104:5 105:22,22 107:9 112:2 125:13,23 130:17 130:18,18 131:4,9 131:20,24 134:6 135:2 136:3,10,15 136:16 <b>pages</b> 1:14 42:15 136:8 <b>pair</b> 88:6 <b>panel</b> 101:2 102:10 102:12,16,18,20 103:6,17,24 112:13 113:21 114:4 <b>paper</b> 4:11,25 7:16 13:15 28:4,15,17 29:14 30:10,18 34:23 35:6,8,24 35:25 36:4,16,20 38:21 39:25 40:11 41:2,21 43:9 44:5 44:19 47:23 62:6 62:15 101:25 <b>papers</b> 28:3 29:18 <b>paragraph</b> 5:5 8:5 12:12 13:18 21:5 28:2 32:22 38:21 39:12 41:21,25 43:9 44:17 55:12 56:9 78:4,9,9 <b>paragraphs</b> 8:14 8:15 13:17 17:10 17:21 90:4 98:2 <b>Parkinson</b> 38:3 <b>part</b> 8:9 23:9 36:9 43:10,22 44:5 56:18 58:12 61:5 77:22 93:9 105:8 109:24 117:13	122:15 132:21 145:23 <b>particle</b> 12:14 20:24 22:24 23:5 23:22 24:1 26:3 52:2 <b>particles</b> 31:13 <b>particular</b> 5:22 13:18 36:22 70:4 87:10 89:9,13 94:23 108:8 125:10 134:23 142:15 146:22,24 <b>particularly</b> 5:4 126:13 <b>partner</b> 128:3 <b>partners</b> 60:8 142:16 <b>parts</b> 44:7 130:12 131:14 <b>party</b> 141:1,6,13 <b>pass</b> 107:21 <b>passage</b> 107:18 <b>passed</b> 57:22,25 67:9 144:3 <b>passengers</b> 62:9 <b>passing</b> 57:19 <b>pasted</b> 27:8 83:7 <b>Pause</b> 32:19 140:24 <b>PAVA</b> 60:16 <b>pay</b> 89:13 <b>payload</b> 52:8 55:19 63:1,11 <b>PC</b> 20:9 21:25 <b>pending</b> 60:14 61:10 <b>people</b> 2:21 4:2 36:2 49:1 79:16 79:19 83:15 85:13 88:18 98:15 99:1 99:3,25 100:6,8 100:21,23 101:1,2 119:14 122:15,15 126:20 <b>people's</b> 99:9,19,24
---	---	--	--	---

<b>perceived</b> 62:8	<b>PIP</b> 114:12	113:15 121:17	<b>possession</b> 95:20,21	<b>preface</b> 128:6
<b>perfect</b> 25:24	<b>place</b> 4:14,17 5:21	127:2 129:20	95:23 97:17	<b>preliminary</b> 14:16
<b>perform</b> 67:1 97:10	14:19 21:23 22:21	134:12,17,17	<b>possible</b> 31:1 38:22	16:18,20
<b>performance</b> 3:5	37:24 38:9 45:8	<b>pointed</b> 51:18	79:17 90:23 91:3	<b>premise</b> 126:18
71:20 105:25	47:19,22 49:5,6	<b>points</b> 106:10	93:15 108:21	<b>premises</b> 62:17
<b>performed</b> 68:9,10	49:22 50:8 59:17	142:13	109:12,14 121:20	<b>preparations</b> 59:10
68:11	78:15 93:15 94:15	<b>police</b> 1:22,24 2:5,6	<b>possibly</b> 42:6	<b>prepared</b> 69:22
<b>performing</b> 19:10	107:2,6 119:18	6:18 7:21 12:25	127:18,18,18	92:5
67:5	123:21 128:12	16:2 18:13 31:11	140:5	<b>preparing</b> 27:24
<b>period</b> 19:24	138:3 141:21	35:19,22,23 36:1	<b>post</b> 4:2 23:4 145:2	<b>preplanned</b> 2:25
111:23 129:17	<b>placed</b> 83:16	36:2 39:12 43:11	145:10	<b>present</b> 23:19
144:11,12,17	<b>plain</b> 10:6	43:14 49:10 54:15	<b>post-incident</b>	56:10,16 60:3
<b>periods</b> 121:14	<b>plainly</b> 136:5	66:18 67:7 74:22	115:14 118:19,22	78:17,22 79:16,19
<b>permission</b> 44:23	<b>plan</b> 83:24	75:7 76:9 98:10	118:25 119:2,8,9	79:21 80:17 81:8
45:18,21	<b>planners</b> 78:21	103:1,2 108:2	119:13 121:11,12	83:3 88:3,5
<b>permitted</b> 61:15	84:12,20 85:5	125:10 132:18,20	121:25 123:17,23	116:24 117:6,10
<b>person</b> 58:24 78:17	88:10	146:5,9	138:7 141:16	<b>presentation</b> 23:10
79:11 85:1 98:8	<b>planning</b> 78:13,14	<b>policing</b> 2:5,24	143:23	80:13 84:17
99:11 109:8	83:4	7:17 10:24 67:3,4	<b>posted</b> 2:4	<b>presented</b> 48:12
112:22 124:16	<b>platform</b> 30:25	73:19	<b>potential</b> 127:9	81:13
<b>personal</b> 4:10	67:24 68:25 69:1	<b>policy</b> 14:14 15:13	146:12	<b>presenting</b> 4:10,24
53:21 76:24 99:7	69:2,10,15	16:6,24 21:11,13	<b>potentially</b> 69:5	13:14 41:22
100:14 102:21	<b>please</b> 1:5,8 5:6 8:1	22:9 23:10 26:19	85:14 87:3 88:10	<b>presently</b> 17:12
125:5	8:9 12:12 19:4	28:11,21,23 29:11	88:15 101:1	36:15
<b>personally</b> 3:10	25:15 26:22 27:19	33:17 37:22 38:4	109:19 113:10,23	<b>presents</b> 40:16
78:11 100:4 105:3	32:17 47:5 48:7	46:6,9,11,13	141:21 142:11,21	<b>pressure</b> 105:10
110:16	49:17 65:14,25	54:13 57:14 59:22	<b>pounds</b> 74:21	<b>pressures</b> 116:23
<b>persons</b> 30:23	77:17 90:4 92:21	59:25 128:12,20	<b>powder</b> 23:5	<b>presumably</b> 138:11
31:13,17 64:6	92:25,25 97:25	129:12,16 133:11	<b>PowerPoint</b> 89:17	<b>presuming</b> 37:22
78:21	98:2 104:4,5	137:6	131:24 132:2,5,14	<b>presumption</b> 53:22
<b>perspective</b> 108:15	107:8,21 112:2	<b>portfolio</b> 74:17,17	133:16,25 137:5	62:13
<b>pertinent</b> 81:17	129:20 130:17	<b>Porton</b> 21:1 22:8	<b>practical</b> 137:8	<b>pretty</b> 77:1
<b>PFOA</b> 116:9,12	131:9 134:6	22:23	<b>practice</b> 3:7 6:18	<b>prevent</b> 55:6
121:21 122:18	<b>plus</b> 79:17	<b>position</b> 7:5 9:6	7:9,21 9:18 13:7,9	<b>prevented</b> 146:13
141:21,24	<b>pm</b> 65:3,5 118:3,5	33:7,9,10,14 36:7	13:11 17:10 18:1	<b>preventing</b> 26:5,14
<b>phase</b> 69:5,6 146:5	147:14	78:10 88:20 94:11	22:17 39:11,18,24	<b>previous</b> 50:25
<b>phone</b> 83:1	<b>pocket</b> 143:1	98:6,14 99:5,10	40:4,7,13,19,21	51:9 78:8 83:7
<b>phrased</b> 82:12	<b>point</b> 2:16 4:16	99:20 100:10,13	40:24 41:7,10,14	85:22 86:4,7 87:2
<b>physical</b> 29:18	10:1 11:16 15:12	101:10 103:6	41:16,25 42:4,8	<b>previously</b> 7:23
84:10 132:6,8	17:20 18:19,22	106:8 107:19	42:18,25 43:2,10	111:7
<b>picked</b> 43:10	29:21,23 45:10	109:25 110:18	43:22 44:6 46:2	<b>primarily</b> 132:1
<b>piece</b> 36:1,14 87:12	48:18 51:20 65:8	112:11 114:3,5	46:12,24 51:19,21	<b>principal</b> 106:1,23
87:21	70:5 73:20 80:12	<b>positive</b> 35:3 58:3	51:23 55:5 143:11	<b>printed</b> 44:5 86:22
<b>pieces</b> 87:18	90:15 91:9 98:9	<b>positively</b> 35:4 72:6	<b>pre-planned</b> 78:13	<b>prior</b> 48:6 84:14
<b>pilot</b> 14:17 15:5	103:11 110:3	<b>possess</b> 95:18	<b>predecessor</b> 19:24	<b>priorities</b> 34:20

<b>privileged</b> 99:20	19:21 21:8 31:21	<b>public</b> 2:11 49:11	120:23 126:10	<b>reaction</b> 52:23
<b>probably</b> 10:14	34:8 35:15 58:12	117:1	127:11	<b>read</b> 8:15 13:16
20:1,25 22:23	59:7	<b>PUF</b> 21:9	<b>questions</b> 1:9,11	14:1 20:6 34:14
52:20 68:21	<b>promised</b> 75:13	<b>pull</b> 124:2	32:3 63:4,5,7	34:16,16 35:2,24
109:23	<b>promoted</b> 67:10	<b>purchase</b> 57:11	65:19,21 76:19	37:18 38:2,4 42:4
<b>problem</b> 7:3	<b>prompt</b> 105:24	<b>purchased</b> 16:1,15	81:17 107:21	52:22 62:5 76:2
<b>problems</b> 20:22,24	<b>promptly</b> 91:20	<b>purely</b> 55:7,9 115:9	117:23 118:6,10	85:23 89:20,20
<b>procedure</b> 118:20	<b>proper</b> 37:1	<b>purity</b> 20:24 23:22	124:15,17,18	96:18 100:1
118:23 119:8	<b>properly</b> 20:5 49:9	52:6	127:21 128:1	104:15 107:18
121:25 128:24	108:11	<b>purpose</b> 18:13	134:16 144:22	108:5 133:4
<b>procedures</b> 3:20,23	<b>proportion</b> 68:20	86:23 96:17,18	145:1 148:4,5,7,8	140:22
47:21 115:14	<b>propose</b> 51:10	116:11 143:15,24	148:9,10	<b>reader</b> 29:24 42:5
121:11,12 123:18	<b>proposed</b> 82:1	144:9	<b>quick</b> 83:15	<b>readiness</b> 27:25
123:23 128:21	<b>proposition</b> 14:11	<b>purposes</b> 34:10	<b>quickly</b> 121:19	<b>reading</b> 105:9
<b>proceedings</b> 50:20	15:12	137:24	<b>quite</b> 6:6 9:18	107:23 111:13
<b>process</b> 4:12 5:7	<b>protect</b> 2:21	<b>pursue</b> 21:10	18:20 22:20 35:9	112:4
16:21 17:25 35:4	<b>proven</b> 126:19	<b>pushy</b> 27:10	38:7 53:1 61:16	<b>ready</b> 69:22 74:11
37:1 46:1 59:21	<b>provide</b> 27:3 69:4	<b>put</b> 5:21 15:20 19:1	90:1 91:25 92:8,9	<b>real</b> 120:7
72:2,10,16 74:5,6	69:15,17 70:20	19:2 33:16 37:19	108:6,9 109:15	<b>realise</b> 22:14 32:1
74:20 75:1,6	122:24 133:18	49:14 51:7 52:22	121:22 126:20	42:3
76:12 78:11,12	135:10 139:16	62:16 74:21 80:9	133:5 142:13	<b>realised</b> 44:11
85:6 89:8 93:15	141:22 142:1	97:17 98:16 99:22	143:9	82:14
100:24 102:19	<b>provided</b> 8:2 25:1	101:17,25 113:21		<b>reality</b> 64:6 144:13
104:19 105:11	27:8 39:8 51:25	128:8 130:11,25	<b>R</b>	<b>really</b> 97:20 113:20
114:12 115:18,21	78:16 111:3,6	137:16 142:19,25	<b>raise</b> 21:9 146:23	129:13
122:23 130:11	116:6 133:1	144:19	<b>raised</b> 22:22 58:15	<b>rear</b> 62:9
139:3 141:16	138:12 139:11	<b>putting</b> 143:24	59:8 60:7,10	<b>reason</b> 7:13 22:3,11
142:23 143:10,13	<b>provider</b> 94:13	<b>pyrotechnic</b> 10:22	102:17 109:2,20	32:6 35:12 36:19
<b>processes</b> 39:24	109:6,10	<b>pyrotechnics</b> 39:6	121:2,3,5 141:23	40:19,21 43:2
<b>produced</b> 7:14,15	<b>providers</b> 146:23		141:24,24,25	51:3 63:14 64:25
28:13 38:25 49:22	<b>provides</b> 25:24	<b>Q</b>	<b>raises</b> 54:4	73:5,12 87:6,8
<b>product</b> 61:4	31:14	<b>Q9</b> 124:10 125:8,9	<b>raising</b> 56:22	90:15 92:7 94:10
<b>production</b> 49:20	<b>providing</b> 2:23	126:5,8 130:20	<b>raison</b> 69:12	96:3 139:6,10
<b>professional</b> 3:7	78:17 138:23	131:5,12 134:24	<b>rang</b> 114:14	<b>reasonable</b> 6:20
24:3 72:11,12	140:13 141:18	135:16	<b>rank</b> 2:1 66:22	<b>reasoned</b> 84:8
96:21 117:8 140:1	142:17	<b>qualified</b> 64:6	98:22	100:5
140:18 142:14	<b>provision</b> 70:8,10	67:13,21 145:7,8	<b>rapport</b> 77:10	<b>reasons</b> 40:12,25
<b>professionally</b>	<b>provisional</b> 145:16	<b>quality</b> 89:6	<b>rate</b> 145:22 146:8	73:2 85:21 90:25
121:22	<b>provisions</b> 64:8	<b>quantities</b> 10:22	<b>rating</b> 87:20	91:21 92:5 93:21
<b>profile</b> 59:8 73:10	<b>provisos</b> 16:13	<b>queried</b> 78:4	<b>ratings</b> 87:11	97:8 102:10
73:14	49:18 57:6,10	<b>query</b> 135:20	<b>rational</b> 112:20	107:25 109:7
<b>profiles</b> 71:4	58:8,19	<b>question</b> 9:4 34:5	<b>rationale</b> 43:7 62:7	116:18 118:17
<b>programmed</b> 32:8	<b>proximately</b> 97:4	36:12 71:25	80:1 94:5	123:1 139:1
<b>progress</b> 59:6	<b>PSDB</b> 19:5 21:3,15	113:12 114:6	<b>raw</b> 133:20	<b>reassurance</b> 23:25
<b>project</b> 6:15 19:17	21:24 22:3 27:13	118:21 119:7	<b>reached</b> 16:10 75:9	32:21,24 33:11

<b>reassurances</b> 51:14	81:2 82:7 86:8,20	23:16 26:3 27:4,7	76:6 90:16,19	43:17 44:2 93:24
<b>reassure</b> 29:25	86:21 87:1,5,20	30:3 39:8 47:2	91:5,9,9 95:11,19	<b>requirements</b> 22:6
116:22	113:4,13 115:19	60:10	96:13 97:1,20,23	39:10 41:17,24
<b>reassured</b> 15:18	142:10	<b>regular</b> 6:22 74:25	111:7,8,16,17,23	42:1 43:12
32:22	<b>recording</b> 86:12	<b>regulations</b> 26:6	111:25 121:3	<b>rescinded</b> 86:2
<b>rebrief</b> 83:24	<b>records</b> 53:20	<b>relate</b> 62:19	123:12 133:3,4	<b>research</b> 3:9,23
<b>recall</b> 4:14 5:1 18:3	102:4,5	<b>related</b> 62:11	137:11 140:2,8,11	4:13,24 11:19
20:7 21:22 23:24	<b>recovered</b> 115:4	120:25 129:16	141:14	15:9,19 19:13
26:20 29:19 30:16	<b>recruitment</b> 3:5,19	<b>relates</b> 43:11	<b>remembered</b> 33:25	22:2 31:17 39:11
35:16 44:19 48:5	<b>reduce</b> 31:12 55:18	<b>relating</b> 6:1 27:5	34:12	41:13 60:15
53:21 54:6,8 55:2	63:24 81:11	91:12 128:13	<b>remembers</b> 111:12	<b>researched</b> 38:22
58:5	<b>reduced</b> 31:17 39:5	140:19	<b>repeat</b> 118:21	<b>reservation</b> 64:1
<b>receipt</b> 146:12	80:6 101:15	<b>relation</b> 5:2 6:15	125:14	<b>resolutions</b> 55:11
<b>receive</b> 81:16	102:24	29:6 41:16 65:10	<b>replace</b> 14:12	<b>resolve</b> 47:4
<b>received</b> 53:17,21	<b>reducing</b> 63:17	70:6 81:20 88:7	<b>replacement</b> 15:6	<b>resolved</b> 26:2 58:18
53:22 76:17 77:25	<b>refer</b> 6:22 29:24	93:11,23 94:21,23	17:5	125:3
81:10 83:19,23	65:23 77:22 119:2	97:22 98:18	<b>replies</b> 105:23	<b>respect</b> 100:21
87:2 88:25 95:1	134:17	100:14 102:12,16	<b>reply</b> 27:17 95:1	<b>respects</b> 131:1
121:10	<b>reference</b> 22:16	103:3 105:1 106:3	<b>replying</b> 134:11	<b>respond</b> 50:17
<b>receiving</b> 40:3	23:16 29:23 30:7	106:5,7,18,22	<b>report</b> 30:3 77:22	112:8
53:24	30:9,17 86:20	111:8 113:18	77:24 91:10 92:13	<b>responding</b> 50:17
<b>recipient</b> 22:14	87:4	114:1 115:13	101:17,24 102:1	<b>responds</b> 77:24
50:24	<b>referenced</b> 10:15	116:22 118:11	102:24 103:24	<b>response</b> 2:24
<b>recognise</b> 75:25	136:3	120:2 121:10,12	<b>reports</b> 77:8 91:8	47:11 49:19,25
82:9	<b>references</b> 29:16,22	122:21,22 123:23	91:23 93:12,17	51:2,9 57:17,24
<b>recognised</b> 77:14	56:3	123:24 126:6	94:17,25 95:7,10	58:3
<b>recollect</b> 96:15	<b>referred</b> 30:2 108:9	127:8 133:15	95:15,18 96:6,11	<b>responsibilities</b>
97:21 140:5	132:22 133:14	139:15 140:12	104:2,15 107:17	2:18 3:1 4:7
141:14	134:4 135:6	142:9,12	<b>represent</b> 116:14	69:24
<b>recollection</b> 96:24	<b>referring</b> 99:10	<b>relationship</b> 76:25	128:2	<b>responsibility</b> 3:8
112:15,19 116:7	135:21 136:14,18	<b>relatively</b> 8:12	<b>represented</b> 59:6	3:11,14,18,25
117:7 121:15	<b>refers</b> 134:23 136:8	83:15	<b>representing</b> 118:8	28:14 29:5 57:23
143:8 144:12	<b>refresher</b> 71:1,17	<b>relevant</b> 8:9 18:5	<b>reprioritise</b> 37:14	57:25 122:19
<b>recommend</b> 12:10	131:10,12,19	22:20 73:13,19	37:14	<b>responsible</b> 2:9,20
41:22 46:8 47:3	132:12,13,23	79:1 80:2,5	<b>request</b> 21:7 62:15	57:19 70:8,10
52:8	133:2,4,6	123:20,25	77:25	71:12 72:23 80:23
<b>recommendation</b>	<b>refreshing</b> 72:15	<b>Relevantly</b> 2:13	<b>requesting</b> 57:4	128:15
15:21 46:8,15,19	<b>refused</b> 36:3,6	<b>reliable</b> 88:22	<b>require</b> 29:9 71:25	<b>rest</b> 43:25 64:21
<b>recommended</b> 17:4	<b>regard</b> 9:11 13:19	<b>reliant</b> 92:14	146:18,22	<b>result</b> 31:2 113:19
51:12	14:4 15:22 23:19	<b>rely</b> 82:20 92:5	<b>required</b> 4:4 9:7	141:22,25
<b>record</b> 78:4 86:13	24:23 30:24 42:17	<b>remain</b> 145:18	43:23 46:2 58:6	<b>resulted</b> 68:16
87:7,11 112:25	43:3	<b>remains</b> 120:23	72:20 73:13	102:6
113:14 117:3	<b>regarded</b> 9:6 13:6	<b>remember</b> 12:5	112:25	<b>resulting</b> 31:15
135:12	17:21 87:17 103:9	26:17 28:12,13,18	<b>requirement</b> 15:7	<b>results</b> 58:21
<b>recorded</b> 79:2 80:3	<b>regarding</b> 3:3	33:5,8 63:2 74:14	20:16,17 21:7	<b>resupply</b> 60:14

61:10 <b>return</b> 95:9 101:10 137:17 <b>returned</b> 91:7 103:22 146:17 <b>returning</b> 90:17 103:21 146:16 <b>returns</b> 41:20 95:7 <b>revealed</b> 21:15,19 26:14 35:5 41:11 <b>revert</b> 81:24 <b>review</b> 6:25 39:10 41:13 60:9 103:6 105:24 128:17 <b>reviewed</b> 7:10 28:18 48:9 104:10 126:16 129:4,14 146:11 <b>reviewing</b> 7:9 <b>reviews</b> 129:6 <b>revised</b> 28:6 <b>rewrite</b> 7:20 <b>rewriting</b> 128:16 <b>rewrote</b> 128:23 129:2 <b>right</b> 1:24 2:2,5 4:20 5:18 6:25 9:12 16:9 19:15 25:3,16 28:15 34:13 38:7,12 44:11 62:23 69:13 77:20 94:21 101:5 110:22 118:19,25 119:5,17 120:7 123:10 124:1,11 127:2 128:23 130:7,10 132:1,7 132:24 133:13 142:18 <b>rigorous</b> 55:14 <b>RIP</b> 5:3 9:2 11:3,5 11:13 13:1 14:12 15:8 16:23 17:5 31:14 39:17 43:19 43:19 55:8,8 62:8	62:14 <b>risk</b> 2:21 31:12,17 39:4 47:9,15,16 47:18,21,24 48:5 48:16,19,22 49:3 49:4,8,11,14 72:19,22 73:24 77:19 78:14,25 79:8 80:10,11 85:14 88:5,11,24 <b>risks</b> 49:10 <b>robustly</b> 106:22 <b>role</b> 4:6,25 6:24 14:8 68:9,11 70:3 71:3 72:1,13 73:10,14 86:6,17 97:10 98:18 <b>roles</b> 97:13 <b>rolled</b> 15:16 <b>room</b> 117:11 <b>rough</b> 117:21 <b>roughly</b> 2:23 <b>round</b> 11:3,5,14 31:14,14 35:14 39:18 43:19,19 55:8 62:8,14 144:15,18 <b>rounds</b> 5:3 38:23 <b>route</b> 35:21 37:6 <b>run</b> 71:7 78:24 89:12 <b>run-up</b> 27:23 <b>running</b> 90:11 <hr/> <b>S</b> <hr/> <b>safe</b> 74:1 <b>safer</b> 5:2 9:1 15:7 55:7 <b>safety</b> 26:2,6,15 27:7 37:15,17,21 39:10 55:10 89:7 94:14 103:4,9 107:14,25 108:10 108:16,18,21 109:16,18 110:9	113:3,4,11,13,19 114:2 <b>sat</b> 41:6 101:1 133:10 <b>satisfaction</b> 58:23 59:18 <b>satisfactory</b> 24:23 <b>satisfied</b> 15:18 24:3 24:6 58:9,19 <b>satisfy</b> 58:20 <b>satisfying</b> 58:8,21 <b>Saturday</b> 83:6 <b>saw</b> 10:10 35:19 77:12 91:10 <b>saying</b> 9:22 10:6 22:15,19 23:4 24:2 25:5,21 27:25 30:6 49:9 55:13 91:12 93:21 96:5,7,10 99:20 100:12,13,19 101:18 109:9 111:9 121:7 126:13 <b>says</b> 7:4 20:9,19 34:23 37:13 42:16 50:2 51:21,23,24 56:18 61:6,8 104:9 107:11 108:4 109:1 123:6 131:19 <b>scale</b> 92:8,15 <b>scenario</b> 132:15 134:23,25 136:11 136:11,12 <b>scenarios</b> 132:9 134:1,3 135:8,9 135:11,22 136:1,4 136:14,18 137:13 <b>scientists</b> 32:25 34:19 <b>scratch</b> 37:1 <b>scrutiny</b> 146:19,25 <b>se</b> 8:22 <b>searched</b> 53:19	<b>searching</b> 15:4 <b>second</b> 26:23 48:19 60:4 67:10,12 88:6 94:10 97:24 103:3 104:12,13 104:19 107:11,19 108:5,15,17 124:12 127:5 136:10 <b>seconded</b> 2:6 38:17 66:25 <b>secondly</b> 14:3 78:19 <b>secondment</b> 2:7 <b>secretariat</b> 7:18 <b>Secretary</b> 8:25 9:23 10:18 13:13,20,21 14:3,17 15:1 16:5 16:11,14 17:15 18:11 42:20,25 45:22 46:14 <b>section</b> 78:6 79:4 85:8,19 86:12 88:2 89:10 104:19 <b>sections</b> 89:14 <b>secure</b> 31:12 <b>security</b> 146:6 <b>see</b> 8:22 10:1,6 14:11 15:4 17:19 23:16 25:17 29:14 29:15 32:18 42:13 46:25 48:9,22 50:15 53:5 58:13 65:24 66:3,6 93:3 93:24 108:21,25 109:13,14,15 123:7,8 125:25 126:1,9 136:7 140:15 141:8 <b>seeing</b> 133:20 <b>seek</b> 7:22 63:24 <b>seeking</b> 25:22 <b>seen</b> 8:4 13:17 48:5 50:20,22 53:1 56:7 57:11,16,18	124:1 130:7 133:23,23,25 134:1 140:15 <b>send</b> 52:4,6 93:12 94:12 <b>sending</b> 20:10 30:16 53:24 146:7 <b>senior</b> 71:11 117:6 <b>sense</b> 87:19 121:1 130:8 <b>sensitivities</b> 81:20 <b>sent</b> 29:17 47:6 50:18 54:1,13 76:16 77:11 94:17 132:23 133:1 <b>sentence</b> 39:22 41:12 42:9 56:18 120:11 <b>separate</b> 70:15 114:7 125:7 <b>sergeant-wise</b> 127:16 <b>sergeants</b> 70:2 106:9 114:14 124:13 <b>series</b> 70:19 124:15 124:23,25 126:11 127:1 <b>serious</b> 72:8 <b>serve</b> 125:2 <b>service</b> 1:22,24 2:5 5:24 32:5 47:3 50:11 60:8 66:18 66:24 <b>Services</b> 146:17 <b>serving</b> 66:20 <b>set</b> 12:4 22:17 32:23 38:2 63:9 78:12 88:12,17 112:17 118:23 <b>settle</b> 143:9 144:4 <b>settled</b> 80:9,12,16 <b>SFC</b> 68:7 <b>SFO</b> 67:13 90:18 93:9 145:3,5,7
---	---	---	---	--

<b>sheet</b> 26:6,15 27:8 30:5,5 47:11 65:22,25 87:23	19:8,19 20:8 21:18,22 22:12 25:22 26:12 27:15 27:18 28:1,12,16 29:12,17 34:16 35:8 36:21 37:11 38:2,16 40:14 41:3 43:5 44:4,8,9 46:17 48:1,3,5,13 48:18 49:12,16 50:14,22 51:4 52:19,24 53:6,10 53:17 54:11 55:2 55:7,22 56:1,12 57:8,18 58:10,25 59:9,20,24 60:2,5 62:6 63:2,6,16,23 64:9,14 65:18 66:5,14 67:14,16 67:20,25 68:5,8 69:1,9 70:23,25 71:6,8 72:4 74:5,8 74:14 75:16,24 76:3,16 77:4,10 77:21 78:3 79:18 81:3,14 82:3,13 84:4 90:6,23 91:9 91:22 92:17 93:2 94:1 95:11,19 96:1,3,12 97:1,6 97:20 98:22 99:9 99:12,19 100:2,12 100:17 101:17,20 102:14 103:14,25 105:1,14 108:1 109:13 110:1,24 111:5,7,16,23 112:3,12,14,19 113:6,8,15 114:9 114:11,19,21,23 115:3,6,21 116:2 116:7,10,18 117:2 117:4,7,12,15,18 118:18,21,24 119:4 120:14	121:4,6 122:9,18 123:12,23,25,25 124:7,9 125:14 126:17,22,23,24 127:20 128:14,17 128:17,20 129:1,3 129:7,10,18,20 130:6,8,20 131:7 131:13,22,25 132:10,16,25 133:3,12 134:7,15 136:1,10 138:2,4 138:7,10,14,20 140:5,17,23 141:7 141:15 143:23 144:2 147:4 <b>sit</b> 1:8 65:16 <b>sits</b> 42:4 <b>sitting</b> 111:12 <b>situation</b> 101:12 <b>situational</b> 5:25 <b>situations</b> 102:2 <b>six</b> 68:22 109:18 113:11 <b>size</b> 12:14,23 20:24 22:24 23:5,17,22 24:1,1 26:3 27:5,7 30:4 52:2 <b>skills</b> 112:24 <b>skip</b> 78:9,10 <b>slightly</b> 64:14,15 144:6 <b>slow</b> 55:5 <b>Smith</b> 19:5,5 20:9 26:7 27:1 <b>SOCA</b> 30:22 78:1 <b>sole</b> 39:1 <b>solution</b> 25:24 <b>somebody</b> 3:18,19 3:20 14:3 25:2 53:8 58:7 66:6 73:21 91:19 101:22 106:19 115:17 118:16 119:6 121:7 123:5	123:14,19 125:8 126:10,14 <b>soon</b> 64:18 93:15 108:5,21 109:12 109:14 <b>sooner</b> 120:14 121:24 <b>SOP</b> 28:6 104:23 104:25 128:17 129:22,23,24 130:1 132:21,22 133:4,8,9,10 134:2 137:5 <b>sorry</b> 24:13,20 26:10 35:7 36:9 38:2 42:10 56:12 56:13 57:13 94:10 107:20 118:21 120:9,15 136:10 141:8,9 146:1 <b>sort</b> 38:19 75:17 77:12,13 106:10 <b>sought</b> 32:24 44:24 45:19,23 61:22 <b>sound</b> 83:25 <b>sounds</b> 133:5 <b>space</b> 86:25 <b>speak</b> 105:3 108:23 116:20 119:12 <b>speaking</b> 4:9 50:3 55:17 75:20 <b>special</b> 57:1 59:13 59:14 68:14,19 <b>specialist</b> 2:7 5:10 6:9 79:23 145:15 <b>Specialists</b> 146:17 <b>specific</b> 35:8 72:22 140:5,8,12 <b>specifically</b> 70:10 <b>speed</b> 72:21 <b>spirit</b> 39:11 41:13 41:15,18 <b>spoke</b> 135:22 <b>spoken</b> 54:19 89:20 <b>sponsor</b> 78:18	80:17,18 81:11,13 81:15,25 82:5 83:2 89:18 90:2 <b>spontaneous</b> 2:25 <b>spray</b> 9:21 10:20 11:2,7 39:17 63:15 <b>spring</b> 145:8 <b>springs</b> 34:5 <b>staff</b> 3:4 5:15 53:12 <b>stage</b> 14:7 15:23 16:9 17:13 45:22 61:5 80:15 81:5 81:21 122:6,8 138:1,12,13,23,24 139:1,11 140:9,9 140:11 142:19 143:12,13,14,15 143:19,20,21 144:4 145:12 <b>stages</b> 78:13 <b>stalled</b> 7:12 <b>stand</b> 53:2 <b>standard</b> 3:22 12:17 47:21 79:14 117:8 128:24 <b>standards</b> 2:6 3:6 5:15 27:7 32:23 33:13 53:11 140:1 140:19 <b>standing</b> 3:25 <b>start</b> 21:6 36:25 52:15 64:22,24,25 118:11 128:12 <b>started</b> 7:10 19:17 51:11 75:4 <b>state</b> 8:25 10:18 13:20 14:4,18 15:2 16:5,11,14 17:9,15 18:12 42:20 43:1 44:19 45:22 46:14 <b>State's</b> 13:21 <b>statement</b> 1:15,18 5:6 12:11 13:5
---	---	--	--	--

30:24 31:6 32:17 33:18,21 34:3,13 42:14,15,23 43:1 44:18 52:3 55:12 66:4,7,11 90:3,4 97:24 110:3 124:4 138:21 143:2 145:6 <b>statements</b> 1:12 66:15 112:9 115:24 116:1,5 117:10,14 120:12 121:7 122:11,12 141:4,18,23 142:1 <b>station</b> 125:10 <b>stayed</b> 67:11 <b>step</b> 14:16 16:4,18 16:20 46:1,9,18 46:19 58:6 59:21 104:22 <b>stepping</b> 104:25 <b>steps</b> 21:9 46:2,7,20 46:21 47:1 <b>stock</b> 117:20 <b>stood</b> 83:22 <b>stop</b> 36:17 43:19 <b>stopped</b> 103:11 138:22 139:2 <b>Stopping</b> 85:25 <b>straight</b> 107:4 144:15 <b>strategic</b> 28:22 73:23 <b>streets</b> 15:16 <b>strength</b> 113:3 <b>strengths</b> 57:2 <b>strike</b> 5:4 11:8 69:16 <b>strikes</b> 18:15 43:18 69:11,22 128:13 <b>structure</b> 74:24 <b>struggling</b> 120:16 <b>student</b> 94:12 107:13 130:9 <b>students</b> 133:19,19	133:23 <b>study</b> 15:5,24 16:4 <b>style</b> 5:22 6:1 30:9 113:23 <b>styles</b> 5:23 <b>subject</b> 16:12 31:15 115:5 129:12 <b>subjectively</b> 109:3 <b>subjects</b> 61:23 69:11 <b>subscribe</b> 5:24 <b>subsequent</b> 38:4 58:6 115:18 138:25 <b>subsequently</b> 16:2 25:13 111:19 129:4 <b>substance</b> 10:7 <b>subtle</b> 144:14 <b>suffice</b> 27:4 <b>sufficient</b> 64:23 <b>suggest</b> 30:8 56:17 56:18,19 91:16 126:6,12 143:22 <b>suggested</b> 88:7,23 <b>suggesting</b> 10:12 <b>suggests</b> 22:13 77:5 82:9 <b>suitability</b> 13:21 20:12 125:2 126:16 127:8 145:18 <b>suitable</b> 13:19 14:5 15:20 17:4,16 55:25 56:1 <b>summarising</b> 17:12 <b>summative</b> 104:18 <b>Superintendent</b> 101:4 <b>superior</b> 7:1 <b>supervise</b> 4:4,5 <b>supervision</b> 5:21 <b>supplement</b> 49:4 <b>supplied</b> 24:9 27:4 61:3,14	<b>supplier</b> 24:14 25:19 27:5,8 <b>suppliers</b> 24:12 39:8 <b>support</b> 21:10 30:20 69:3 79:25 85:3 88:8,13 89:5 <b>supported</b> 3:17 70:18 88:22 <b>supporting</b> 30:11 30:14 119:14 <b>supportive</b> 6:10 <b>suppose</b> 45:5 49:3 62:5 123:25 <b>supposed</b> 73:4,8 <b>sure</b> 5:16 7:12 12:2 14:25 17:16 41:7 47:18 51:11 52:20 54:18 60:25 61:16 63:9 65:7 74:23 81:18,20 120:10 128:11 147:6 <b>surprise</b> 6:7 35:24 <b>surprised</b> 52:24 120:4,11 <b>surprising</b> 54:23 <b>surveillance</b> 69:3 <b>suspect</b> 6:23 8:13 77:18 <b>suspects</b> 30:23 <b>suspend</b> 52:18 <b>suspended</b> 60:13 60:24 61:10 109:23 <b>suspension</b> 51:12 <b>swiftly</b> 132:5 <b>sworn</b> 1:6 65:15 148:3,6 <b>synopsis</b> 78:25 80:2 80:5,9,16 82:7 <b>system</b> 8:17,23 9:7 9:9,12,15,18,22 10:9,9 11:6,9 13:19 17:19,22,24 18:4 22:15 29:1,2	38:24 42:11,17 43:4,20 44:2 46:22,24 53:18 63:20 64:7 87:16 <b>systems</b> 23:21 38:22 39:1,5 43:13 <hr/> <b>T</b> <hr/> <b>TA</b> 79:19,21 83:3 <b>tab</b> 1:13 8:2 19:4 22:25 23:1,12 25:11,15 26:10,22 27:19,21 29:13 32:18 34:25 37:25 42:15 44:9 47:5 48:7 49:17 50:15 56:9,12,13 60:1 66:3,6,10 77:23 97:25 128:18 <b>tabbed</b> 1:14 <b>table</b> 29:21 47:23 <b>TAC</b> 56:23 68:11 84:13,19 85:4,7 85:11,18,22,25 86:4,6,7,13,17 87:12,22 <b>tactic</b> 13:2 67:21 69:10,15,16 104:20,21 <b>tactical</b> 30:19 38:25 67:7 78:20,20 79:22,24 81:3 84:11 <b>tactics</b> 3:23 25:23 25:25 30:20 49:5 69:4,17,23 72:15 79:23 110:11 <b>tainted</b> 123:6 <b>take</b> 8:11 14:14 19:3 35:14 44:13 45:22 54:7 59:16 64:14 74:12 75:14 78:15 81:9 82:4 89:1 91:25 92:18	93:15 94:15,24 101:11 104:1,4 108:14 109:24 110:21 111:4 112:22 117:19,25 118:2 126:1 128:22 133:17 134:24 137:15 144:20 <b>taken</b> 16:23 20:5 21:23 22:21 31:22 37:18 38:9 45:7 46:4 49:22 50:8 61:2 68:17 82:10 109:23 113:24 116:1 117:11 141:21 144:17 <b>takes</b> 38:23 139:3 <b>talk</b> 42:19 80:2 <b>talked</b> 108:24 <b>talking</b> 11:16 12:1 12:13,19 26:18 99:16,17 102:13 102:14 122:4,11 122:14 123:8 <b>talks</b> 37:12 <b>Taser</b> 126:4 <b>task</b> 5:16,21 7:8 53:12 <b>tasked</b> 22:1 <b>taught</b> 5:23 <b>team</b> 3:21 5:10 6:5 15:9 31:21 58:12 67:3,6 69:25 70:1 70:3,6,15,17 74:18 75:18,19 76:10 81:8,17 83:4,20 84:5,20 88:10,15,16 89:3 89:4 96:22 106:9 106:15,21 107:1,3 107:5,7 114:14,15 114:18 115:8,15 116:16,20 118:15 118:22 119:1,6,13
---	--	--	---	---



119:14 120:2,4,5 120:11 143:23 145:14 <b>team's</b> 70:4 <b>teams</b> 3:6 4:8 69:3 <b>tease</b> 133:18 <b>technical</b> 13:22 14:6 <b>technically</b> 62:5 <b>technology</b> 53:25 <b>tell</b> 50:4 58:3 78:11 87:15 94:4,6 108:23 <b>telling</b> 90:21 91:1 92:5 95:2 <b>temperament</b> 126:7,12,14,15 <b>temporary</b> 6:8 <b>ten</b> 117:22,24 <b>tended</b> 3:16 <b>tends</b> 30:8 91:16 <b>termed</b> 41:15 <b>terms</b> 6:10 11:16 11:19 12:8 15:6 18:17 21:23 28:18 28:19,23,25 31:4 31:8,9,23 32:7 33:17 37:5,5 41:6 42:10 43:6 45:7 46:5 47:10,15 49:19 50:1 51:14 51:15 54:23 57:16 58:7 70:13 72:10 72:11,15,15 118:22 142:17 143:10,12 <b>terrorism</b> 3:2 67:2 67:4 <b>test</b> 32:4,4 33:7,10 33:14 34:6 35:17 36:2,3,6,8,15 37:5 47:4 52:5,6 <b>tested</b> 18:21 33:19 35:23 36:14 44:21 45:2,3,5 56:6	<b>testing</b> 15:19 22:7 35:22 41:8 44:23 45:18 <b>text</b> 30:8 <b>TFC</b> 69:17 79:5,5 80:14 83:2 84:19 84:25 85:7,10 88:8,12,24 89:12 146:16,20 <b>TFU</b> 2:14,18 3:16 4:20 6:6 19:10 38:22 60:16 72:24 105:16 <b>thank</b> 1:4 3:8 63:3 63:6 64:12 65:1,2 65:13,16,18 104:7 105:24 117:16,17 130:2 134:5 136:2 136:17 144:21 147:3,4,8,13 <b>Thanks</b> 20:10 27:2 93:9 <b>theme</b> 41:20 <b>thereabouts</b> 122:1 <b>thing</b> 9:14 34:1,2 51:22 52:1 75:16 77:2 79:7 92:18 108:14 114:23 <b>things</b> 7:22 12:2 19:1 20:15 21:16 21:17,20 22:4,10 22:16,22 25:12 29:20 32:13 53:3 54:18 78:15 84:1 94:23 112:9 <b>think</b> 2:1,13,16 3:15,17,22,23 4:14,23 6:24 7:14 7:14 9:9,19,19 10:1,11,14,18 11:6,16 12:1,5,11 12:13 13:5,9,16 13:17 14:1,7,10 17:11,18,25 18:4 19:6,11,13,15,22	19:23 20:4,9 22:2 22:10,12 23:9,21 23:24 24:8 26:19 27:20,20 29:1,17 30:17 31:25 32:6 32:18,21 33:9 34:4,4,6,7,9,22 35:8,19 36:6,7,19 37:2,3 38:6 39:23 40:3,6 41:3,15,16 41:18,22 42:6,11 42:13,16,22 43:6 45:13 46:4,22,25 47:5,18 48:3 49:23 51:2,14,16 53:18 54:10,15,16 54:21 55:23 56:1 56:4 57:11 58:17 58:25 59:20 60:3 62:14,16 64:4,21 65:6,10 66:20 68:1 69:8,19,21 83:21 87:8 90:11 90:21 91:11 92:25 93:3 94:16 96:24 100:2,17 102:12 103:22 105:13 111:7 112:21 113:20 116:21 117:22,25 121:6 121:16,21 122:2 122:25 127:21 128:10,16,18 131:19 132:22 133:5,8,8,9,25 134:4 135:25 136:1 139:3,25 142:2 143:4,6,7,9 143:18 144:2 <b>thinking</b> 8:21 38:3 60:25 <b>thinks</b> 22:2 <b>third</b> 28:2 56:9 78:4 130:13 <b>thirdly</b> 78:20	<b>Thomas</b> 65:6,10 117:18,22 118:6,7 118:7 120:16 125:22 127:20,23 138:16 148:8 <b>Thompson</b> 16:7,25 18:8,17 47:8 49:24 51:8,17 52:17,20 61:22 62:15,18 <b>Thompson's</b> 49:17 57:5 58:8,19 59:19 <b>thorough</b> 5:17 53:13 55:15 <b>thought</b> 10:14 13:12 16:3,17 17:4 18:3,5 38:18 40:7 46:1 55:21 58:14 63:12,22 102:23 <b>thoughts</b> 116:21 <b>threat</b> 2:20 67:2 72:18,22 73:23 82:17,19 92:9 <b>threatening</b> 109:19 <b>three</b> 16:13 52:23 57:5,10 58:8,10 58:19 59:19 79:16 115:22 135:8 136:21 143:17 <b>Thursday</b> 116:8 <b>thwarted</b> 106:21 <b>time</b> 3:25 4:19 6:17 8:21 9:16 10:10 12:24 13:10 14:10 17:2,23 18:3 19:7 19:10 20:2,4,7 26:16,20 27:21 33:9 35:14 38:18 42:7 43:8 47:17 48:4 52:25 57:12 59:16 60:24 64:23 67:15 69:2,8 71:9 79:11,14,14 82:20	83:15,17,25 89:12 89:19 90:7,17 91:6,8 113:2 114:10 116:24 121:14 122:2 125:23 127:1,12 127:13,16 139:3,9 142:22 143:8 144:3,17 145:20 146:4 <b>timed</b> 87:1 <b>timescales</b> 121:20 123:8 <b>timetable</b> 147:12 <b>timing</b> 138:16 141:4 <b>timings</b> 140:2 <b>today</b> 64:22 107:13 128:8 <b>told</b> 11:20 21:25 22:3,11 31:23 32:10,12,15,25 33:23 35:1 37:9 37:10 39:15 45:1 50:24 53:7 63:8 72:23 74:9 75:22 82:21 94:7 102:22 103:22 107:2 115:1,2,4 137:19 138:15,16 140:20 <b>tomorrow</b> 95:7 96:5 <b>top</b> 6:5 26:23 131:21 <b>topic</b> 77:17 114:7 120:19,22,25 121:3 124:8,8 <b>topical</b> 141:19 <b>topics</b> 142:4 <b>tops</b> 117:22 <b>total</b> 136:9 <b>toxicity</b> 39:9 <b>track</b> 112:25 <b>tragic</b> 116:13 <b>trail</b> 18:25
---	--	---	--	--

<b>train</b> 93:9	70:5 100:17 134:9	62:21 68:24 69:1	<b>updating</b> 50:9	62:16 69:12
<b>trained</b> 67:13 71:4	<b>Tuesday</b> 147:10,11	69:7,20 70:25	<b>upwards</b> 102:1	<b>vein</b> 52:21
71:11 74:23 81:4	147:12,13,15	71:8,10 73:6	<b>urgent</b> 72:17,18	<b>verbal</b> 91:25
110:11 131:6	<b>turn</b> 26:22 27:19	96:22 101:9 110:4	93:25	<b>verification</b> 52:9
133:17	29:13 77:17 85:16	110:21 112:20	<b>urgently</b> 94:15	<b>verify</b> 52:2 81:5
<b>training</b> 67:17,19	90:3 107:8 112:2	120:8 132:16	<b>usable</b> 5:8	<b>version</b> 83:7 128:24
70:8,11,12,13,18	114:7 125:13	145:6	<b>usage</b> 40:9	129:2,4,5,11,13
70:20,22,24 71:1	128:18 131:2,8	<b>understood</b> 50:5	<b>use</b> 2:10 5:25 6:18	129:13
71:15,17,17,20,23	140:16	69:21 108:5 110:6	7:21 9:23 10:9	<b>vetted</b> 25:2
72:5,14,17,21,23	<b>turns</b> 130:13	<b>undertake</b> 71:2	12:25 16:12,19	<b>viability</b> 15:24 16:3
72:24 73:5,13,18	<b>twice</b> 8:12	<b>undertaken</b> 19:14	17:5 18:12,13	17:14 106:14
73:20,25 74:3	<b>two</b> 19:1 40:12	46:20 67:17,19	21:11 25:22 29:9	<b>viable</b> 14:11 15:1
75:6 76:7 81:19	66:15 75:23 76:13	<b>undertaking</b> 6:24	31:3 35:23 38:23	15:12 16:22 33:16
82:3 89:2 93:12	94:3 130:12 136:8	7:8	39:6,12,17 40:8	38:24
94:19,23 98:11,12	143:17	<b>undertook</b> 134:25	47:12 48:15,23	<b>view</b> 5:20 6:3 8:21
98:13,15,20 99:3	<b>type</b> 21:11 98:12	<b>unfortunately</b>	56:17,19,20 57:6	12:22 13:8 17:23
104:21 105:17	<b>types</b> 52:1 137:12	20:11 107:12	60:7,9,13,16	17:23 25:1 46:4
108:7,7,8 110:5		<b>unfounded</b> 145:19	61:10,23 62:4,11	46:18 65:8 101:12
121:10 129:17,19	<b>U</b>	<b>unintended</b> 20:18	65:25 68:14 86:22	101:15 109:4
129:23,24,25,25	<b>UK</b> 24:19 25:10	20:22	123:13 126:4	110:13,22 112:5
130:3,4,8,12,18	26:7 27:8 39:1	<b>unique</b> 98:5,8 99:4	127:9	113:3 120:4,13
130:24 131:4,16	<b>ultimate</b> 30:22	110:18	<b>useful</b> 55:10	121:17,23 133:12
131:18,23 132:1,4	<b>ultimately</b> 14:24	<b>uniqueness</b> 112:10	<b>usefully</b> 147:6	142:6,16
132:12,15,18,20	32:4 85:2,10	<b>unit</b> 3:5 19:22	<b>User</b> 28:8 56:11,17	<b>viewpoint</b> 52:12
133:5,8,19 134:19	92:11 97:16 107:4	21:13,15 30:19	57:13 59:10,16	109:1 110:12
135:6,8,20 136:22	114:1	37:15,17,21 67:7	<b>uses</b> 60:18	113:17,21 114:2
137:2,5 145:24	<b>unarmed</b> 48:25	67:12 70:12 71:10	<b>usually</b> 31:9	<b>views</b> 13:21 45:7,9
146:5	<b>unclear</b> 119:1,11	75:3 129:23	<b>utilised</b> 15:2	45:12,13 112:17
<b>transcript</b> 34:14	<b>unconsciously</b>	<b>units</b> 12:10 30:21	<b>uttered</b> 89:8	<b>visit</b> 116:13,16,16
<b>transfer</b> 87:3	123:6	<b>unknown</b> 25:4,5,8		<b>vitality</b> 82:15
<b>transparent</b> 75:8	<b>undermining</b> 99:19	<b>unnecessary</b> 13:6	<b>V</b>	<b>voice</b> 142:10,10
121:19	<b>understand</b> 5:1	39:19 126:2	<b>V</b> 1:12 8:2	<b>volume</b> 8:2 19:3,3
<b>tread</b> 106:19	34:11 39:20 47:15	<b>unproven</b> 126:25	<b>V53</b> 116:17 119:25	87:6
<b>trial</b> 61:5	49:20 57:8 65:11	<b>unrelated</b> 102:7	120:18	
<b>trouble</b> 120:8	103:15 120:16	122:15 123:5	<b>validating</b> 35:19	<b>W</b>
<b>true</b> 1:18 66:15	122:22	<b>unsubstantiated</b>	<b>value</b> 15:3 92:19	<b>wait</b> 143:18
126:22	<b>understanding</b> 4:6	124:24	<b>variations</b> 31:8	<b>want</b> 9:24 17:14
<b>trusted</b> 58:16	8:20 9:16 11:17	<b>unsuitable</b> 17:16	<b>variety</b> 69:4	27:10 51:14 52:2
<b>truthful</b> 121:19	14:24 17:7 29:3	<b>unsure</b> 119:1	<b>vehicle</b> 5:4 18:15	52:6,8,10,12 56:7
122:24	29:12 31:19,21,25	<b>untruthfulness</b>	43:18 49:7 55:11	64:10 85:16 86:7
<b>truthfulness</b> 123:3	32:14 33:6 34:4	123:3	61:24 62:9 69:16	87:10,19 92:11
<b>try</b> 33:15 64:24	36:7 37:7,8 38:8	<b>unusual</b> 126:24	69:22 115:5	99:5 103:15
87:3	39:15 43:7,8	133:5	128:13	106:19 108:20
<b>trying</b> 8:25 13:9	45:14 46:21 47:8	<b>update</b> 90:2	<b>vehicles</b> 3:20 5:4	109:11,13,14
17:3 43:6 63:24	55:3 57:9,21 62:3	<b>updates</b> 89:24,24	13:1 43:18 48:23	118:15 119:5

120:9 121:22,23 128:4 131:15 134:17 137:17 <b>wanted</b> 6:6 12:2,17 14:25 17:16 18:22 29:24 32:22 54:18 63:8 93:19 106:19 115:15 <b>wanting</b> 29:25 <b>warning</b> 113:4,4,13 113:20 <b>warnings</b> 114:3 <b>washed</b> 60:17 <b>wasn't</b> 9:21 10:25 11:2 13:10 16:20 18:21 19:8 21:19 25:3 26:12,16 27:18 35:5 37:4,4 37:8 46:8,19 47:16 48:12 57:21 59:5 61:13,24 62:9 79:14 96:1 102:8 111:6 115:21 <b>water</b> 19:18 <b>way</b> 1:21 10:10 14:2,15 20:20 32:9 34:7 35:3 50:3 51:16 52:22 71:21 73:7 75:20 75:24 76:15 91:23 91:24 97:9 98:21 103:23 105:7 115:25 116:3 122:10 123:13 126:6 127:8 131:2 134:8 137:2 140:14 144:14,18 144:19 <b>weapon</b> 9:21 10:9 11:6,9 17:19,22 17:24 18:4 21:12 29:8 33:19 64:7 115:1,4 <b>weapons</b> 2:11 3:9	6:19 8:7,16,22 9:7 9:9,12,14,18 13:19 22:15 29:1 29:2 42:17 43:4 43:13,20 <b>Weatherby</b> 117:24 127:21 128:1,2 130:23 131:23 136:18 141:7,10 144:20 148:9 <b>week</b> 54:11,17,22 66:13 73:2 128:5 <b>weeks</b> 80:20 <b>WEF</b> 21:10 <b>weight</b> 12:23 33:12 <b>welfare</b> 84:5 106:8 106:18,24 114:15 115:9 116:13,16 119:23,24 120:18 120:19,21 121:1,6 121:17 122:19,21 137:24 138:16,17 139:4 141:4 142:4 142:8,15 <b>well-intentioned</b> 145:19 <b>went</b> 7:11 35:9,21 54:7 57:12 58:7 75:5 103:12 130:8 130:20 131:12 137:19 <b>weren't</b> 73:3 <b>whatsoever</b> 115:21 <b>whilst</b> 80:17 125:6 146:25 <b>Whittle</b> 135:3 <b>wholly</b> 63:18 <b>Whyte</b> 63:5,6 144:22,23 145:1,2 146:1 147:3 148:10 <b>widely</b> 25:24 <b>wider</b> 3:1 53:25 122:21 <b>Williams</b> 73:1 74:7	74:19,20 75:13,19 75:21,22,24 76:1 76:14,17 77:15 93:14 94:17,18,25 95:15,22 96:19 97:15,16 100:8,9 101:1 102:17 103:8,15 104:7 105:4 109:17 110:14 111:18,25 112:1 113:18,21 124:14,19,20 134:12,18 145:17 <b>Williams's</b> 96:10 105:20 112:5 113:17 <b>winding</b> 18:7 <b>wish</b> 65:17 141:22 142:1 <b>wished</b> 48:16 <b>withheld</b> 53:16 <b>witness</b> 1:12,15,18 5:5 12:11 32:17 33:21 34:2,13 42:13,14,22 43:1 44:18 55:12 64:21 66:3,7,10,15 90:3 90:4 97:24 112:9 115:23 116:5 117:10,13 141:6 143:1 145:6 147:7 <b>witnesses</b> 130:13 <b>wonder</b> 64:14 <b>Wood</b> 27:20 <b>word</b> 15:4 25:3 <b>words</b> 43:5 69:5 74:10 79:2 80:3,6 80:9,17 81:1,2,4 81:12,16,19 82:8 82:11,15 83:3 84:9,14 85:1 88:7 89:7 <b>work</b> 6:11 7:23 15:17 21:6,8 32:8 33:24 34:7,20	35:7 46:5 58:17 58:20 64:1 71:18 89:1 <b>worked</b> 15:10 53:11 70:2,16 77:1 80:19 105:6 <b>working</b> 20:1,3 38:11 <b>works</b> 126:19 <b>worldwide</b> 24:11 <b>worse</b> 121:15 <b>wouldn't</b> 6:21 14:19 22:3,11 39:23 48:14 52:16 59:7 69:13 73:9 80:18 81:6,14,21 81:23,24 88:4,18 89:2 92:16 93:19 101:23 109:23 114:5 132:17 134:1 143:6 <b>write</b> 28:15 101:24 <b>writer</b> 7:19 <b>writing</b> 81:12 101:15 102:24 103:23,24 104:2 112:8 <b>written</b> 36:4,16 47:11 49:19 51:1 57:17,23 72:2 116:25 129:22,25 141:18 <b>wrong</b> 40:23 <b>wrote</b> 50:16 62:15	106:11,25 107:2 146:11 <b>X7's</b> 76:20 90:16 90:25 91:14 93:11 93:20 94:22 95:7 95:10,15,18 96:6 96:10 97:8 104:10 105:2,24 106:7 <hr/> <b>Y</b> <hr/> <b>Y</b> 92:21,25 107:9 <b>Y/1</b> 92:25 <b>Y/1113</b> 140:16,16 <b>year</b> 19:9 71:11,13 71:14,15 72:5,18 107:20 <b>years</b> 1:24 24:10 71:19 75:5 76:13 125:11,12 <b>yesterday</b> 5:12 6:12 34:1 35:1 <hr/> <b>Z</b> <hr/> <b>Z15</b> 76:4 77:2 91:12 95:2,6,9 96:5,7 102:13,14 102:16,21 103:17 103:18 107:8,14 107:19 108:23,23 109:1 111:9,11 112:18,19,22 113:22,24 145:2 <b>Z15's</b> 101:10 102:4 109:20,22 112:6 113:5,24 <hr/> <b>0</b> <hr/> <b>1</b> <hr/> <b>1</b> 19:3 66:3 136:5 136:11,14,18 146:5 148:3,4 <b>1.2.1</b> 8:5 <b>1.3.3</b> 8:6 <b>1.30</b> 64:18 <b>1.50</b> 64:22 65:1
--	--	---	---	--

<b>1.54</b> 65:5	<b>19</b> 27:19,21	<b>24</b> 47:5 49:17 56:13	<hr/> <b>4</b> <hr/>	<hr/> <b>8</b> <hr/>
<b>10</b> 44:17 68:18,19 130:21	<b>1988</b> 1:23	56:13 90:4,14	<b>4</b> 43:25 60:14	<b>8</b> 38:21 116:8
<b>10.30</b> 1:2 147:11,12 147:15	<b>1996</b> 66:19	98:2 100:1	103:12 128:18	119:22 128:25
<b>11</b> 139:7	<hr/> <b>2</b> <hr/>	<b>24/7</b> 2:23	136:12,16 138:13	129:5,11,13
<b>11.43</b> 44:14	<b>2</b> 66:6 78:7 136:5	<b>245</b> 131:9,20	140:9,11 143:2,7	138:11 142:20
<b>11.55</b> 44:16	136:11,18	<b>25</b> 26:22 50:15 56:9	143:12,14,19,21	143:3
<b>1146</b> 125:13	<b>2.00</b> 64:19	59:22 90:5 147:16	<b>4.3</b> 8:10	<b>8th</b> 119:22 139:12
<b>1148</b> 125:16,18,22	<b>20</b> 25:18 48:10	<b>255</b> 131:24	<b>4.3.1</b> 8:11,15 39:12	<hr/> <b>9</b> <hr/>
<b>1148(a)</b> 125:13,14	<b>20</b> 25:18 48:10	<b>27</b> 91:12 93:4 99:13	41:25 42:4 43:10	<b>9</b> 1:13 19:4 25:11
<b>116</b> 48:20	112:2 118:1	100:1	<b>4.3.2</b> 43:25	32:18 42:15 57:12
<b>118</b> 148:8	<b>2001</b> 67:9	<b>27th</b> 111:9	<b>4.3.3</b> 13:18	115:24 117:10
<b>11th</b> 29:15	<b>2003</b> 8:5 67:10,11	<b>28</b> 95:9,17 98:2	<b>40</b> 68:15 146:10	
<b>12</b> 4:11,25 12:6	<b>2004</b> 67:12	100:1 101:8	<b>455</b> 128:21	
13:15 18:7 27:23	<b>2005</b> 19:11,14	<b>28th</b> 96:5,8,13	<b>48</b> 122:1	
54:12 55:18,24	67:22,23	111:13	<b>4th</b> 139:11	
59:25 61:3,19,21	<b>2006</b> 2:16 19:15,22	<b>29</b> 1:13,14,16,24	<hr/> <b>5</b> <hr/>	
63:1 64:2 125:7	<b>2007</b> 4:11 6:17 7:2	32:18 42:15	<b>5</b> 8:2 23:3 43:25	
136:13	7:5 8:20 9:6	<b>2A</b> 66:10 97:25	55:19,25 56:4	
<b>12-gram</b> 61:15	25:18 38:6 48:9	<hr/> <b>3</b> <hr/>	61:18,21 64:2	
<b>12.27</b> 65:3	50:16 57:12,14	<b>3</b> 5:5 8:5 26:23	77:24 103:12	
<b>122</b> 92:25 93:1	59:11 126:2	41:20 43:25 77:23	143:3	
107:9	<b>2008</b> 48:10	103:12 109:22,24	<b>50</b> 68:15,21 146:10	
<b>128</b> 148:9	<b>2009</b> 7:10 75:5	111:4,6 114:8,12	<b>51</b> 130:17,18 131:4	
<b>12th</b> 28:11 29:14	<b>2010</b> 2:15,17 129:2	118:12 122:6,8	<b>5th</b> 119:21 139:11	
<b>13</b> 45:10 48:9 50:16	130:19 131:6	128:13 129:12	<b>5x5</b> 86:14 87:9,11	
59:3 136:9 138:11	<b>2011</b> 67:16 126:2,3	131:5 136:5,12,14	87:16,20	
141:3	131:12 132:13	136:18 137:18	<hr/> <b>6</b> <hr/>	
<b>14</b> 48:7 60:6 76:23	<b>2012</b> 67:5,5,23	138:1,12,23,24	<b>6</b> 3:17 55:12 103:13	
90:19 91:6 97:5	68:24 69:20,24	139:1,11 140:9	128:24 129:2,13	
130:21	77:24 79:8 90:12	142:19 143:13,15	134:17 135:5	
<b>145</b> 148:10	90:19 91:12 98:5	143:20 144:5	143:3	
<b>14th</b> 97:9	98:8 114:8 116:8	<b>3.09</b> 118:3	<b>6.00</b> 83:6,24,24	
<b>15</b> 22:25 23:1 103:8	146:1,2	<b>3.15</b> 118:5	<b>60</b> 68:21	
104:8 105:22	<b>2013</b> 145:3,7	<b>3.2</b> 8:15	<b>63</b> 148:5	
135:16	<b>2014</b> 145:8	<b>3.3</b> 8:15	<b>65</b> 148:6,7	
<b>157</b> 26:23	<b>2015</b> 145:23,25	<b>3.55</b> 147:14	<b>6th</b> 139:12	
<b>15th</b> 126:3	<b>2016</b> 1:16 2:15	<b>30</b> 68:3,4,5,9,13,16	<hr/> <b>7</b> <hr/>	
<b>16</b> 90:11,12 104:5	<b>2017</b> 1:1 12:14	<b>31</b> 42:15	<b>7</b> 12:12 32:22 38:21	
115:19 136:9,16	26:13 66:4,11	<b>34</b> 60:1	129:4 134:17,24	
138:12 146:10	147:16	<b>372</b> 134:6,16	135:5,15 143:3	
<b>17</b> 25:15 26:11	<b>21</b> 1:1 23:12,14	<b>373</b> 134:16	<b>7th</b> 139:12	
66:11 83:2	29:13 34:25 41:21	<b>38</b> 1:15		
<b>18</b> 19:4 20:3 22:18	126:3	<b>389</b> 135:2		
	<b>21B</b> 43:9			
	<b>23</b> 37:25 44:9 66:4			